

FINAL ENVIRONMENTAL IMPACT REPORT (SCH # 2010111094)

FOR THE

CITY OF LA QUINTA GENERAL PLAN

Prepared For

City of La Quinta 78-495 Calle Tampico La Quinta, CA 92253



FINAL EIR RESPONSE TO COMMENTS ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF LA QUINTA GENERAL PLAN

NOVEMBER, 2012

CITY OF LA QUINTA, CALIFORNIA STATE CLEARINGHOUSE NO. 2010111094

AGENCY COMMENTS/RESPONSE TO COMMENTS

The Response to Comments on the Draft EIR for the La Quinta General Plan project has been prepared in accordance with Section 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA) Guidelines. The following agencies and interested parties have commented on the Draft EIR. Please note that Section I contains verbatim comments from agency and other interested parties, and subsequent responses. Section II contains the full text of commenting agency correspondence.

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FINAL ENVIRONMENTAL IMPACT REPORT CITY OF LA QUINTA GENERAL PLAN

SECTION I

RESPONSE TO COMMENTS

The following comments were received on the Draft EIR transmitted to various public agencies and interested parties. These comments concern aspects of the Draft EIR, including clarification of information, adequacy of analysis, and similar issues. Related comments may occasionally be combined to allow one response to address these related questions. The following responses have been prepared to address issues raised in the agency/interested party comments.

A. CALIFORNIA STATE CLEARINGHOUSE

Comment A-1:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 27, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Response A-1:

Comment noted. The comments received from the Native American Heritage Commission are addressed separately, under Response B, below.

B. NATIVE AMERICAN HERITAGE COMMISSION

Comment B-1:

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352/3, et seq.

Response B-1: Comment noted.

Comment B-2:

The California Environmental Quality Act (CEQA- CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

Response B-2: Comment noted.

Comment B-3:

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §\$5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Response B-3: Comment noted.

Comment B-4:

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations

concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Response B-4:

As part of the preparation of the Cultural Resources Technical Study for the General Plan (Appendix D of the DEIR), a written request was made of the Native American Heritage Commission (March 22, 2010), for a records search of the Commission's sacred lands file. The Commission identified 13 Tribal representatives in its response, and all these representatives were contacted in writing, and were asked to provide concerns or comments on the General Plan Technical Study. In addition, representatives of the August Band, the Cabazon Band, the Ramona Band, the Santa Rosa Band and the Torres Martinez Band were contacted at that time. One response was received from the Cabazon Band, stating that they had no specific information regarding cultural resources in the area.

In addition, the City completed SB 18 consultation, and received one response from the Cabazon Band, to which the City responded.

Comment B-5:

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seg. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Response B-5: Comment noted. The General Plan is not subject to NEPA.

Comment B-6: Confidentiality of "historic properties of religious and cultural

significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility

threatened by proposed project activity.

Response B-6: Comment noted.

Comment B-7: Furthermore, Public Resources Code Section 5097.98, California

Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human

remains in a project location other than a 'dedicated cemetery'.

Response B-7: Comment noted.

Comment B-8: To be effective, consultation on specific projects must be the result of an

ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative

consultation tribal input on specific projects.

Response B-8: Comment noted.

Comment B-9: Finally, when Native American cultural sites and/or Native American

burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section

15370(a).

Response B-9: Comment noted.

C. RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Comment C-1:

On page 111-99 of the Draft EIR, Bermuda Dunes Airport is variously referred to as a "private airfield" or a "private airstrip." This is an incorrect classification. Bermuda Dunes Airport should be described as a "privately-owned public use airport." As a public use airport, Bermuda Dunes Airport is subject to permitting requirements of the State of California Department of Transportation Division of Aeronautics. Another distinction between a public use airport and a private airstrip is that Airport Land Use Commissions are required to prepare Airport Land Use Compatibility Plans for the environs of public use airports. A handwritten annotated copy of page 111-99 is attached hereto, and we would recommend that the Final EIR incorporate the recommended changes.

Response C-1: Comment noted. The changes are hereby incorporated.

Comment C-2: A portion of the City of La Quinta located northerly of Fred Waring Drive

and westerly of Jefferson Street is within Compatibility Zone D and is proposed for a land use designation of Low Density Residential (0 to 4 dwelling units per acre). This land use designation is not consistent with Countywide compatibility criteria for Compatibility Zone D; however, as this designation reflects an existing land use (a recorded tract map), a finding of consistency could still be made by the Airport Land Use

Commission.

Response C-2: Comment noted.

Comment C-3: The current boundaries of the City of La Quinta lie outside the Airport

Influence Area for Jacqueline Cochran Regional Airport, but the sphere of influence extends into this area and is included primarily in Compatibility Zones D and E. Small portions of Compatibility Zones C and B1 extend into the area directly southwesterly of the Airport Boulevard/Harrison Street intersection. This area is within the community of Vista Santa Rosa, where the Commission has indicated a willingness to consider special policies if large expanses of open area can be preserved in perpetuity. (Please see the attached letter from the Airport Land Use Commission to

the Riverside County Planning Department regarding this issue.)

Response C-3: Comment noted.

Comment C-4: Pursuant to Section 21676(b) of the California Public Utilities Code,

"prior to the amendment of a general plan...the local agency shall first refer the proposed action to [ALUC]." At the appropriate time prior to action (ideally before Planning Commission consideration, but definitely

before City Council action), the new General Plan should be submitted to the Airport Land Use Commission for a consistency review. (A copy of the "Application for Major Land Use Action Review" form is attached, for your convenience.)

Response C-4:

Comment noted. As stated by the commenter, all property in the City within the Bermuda Dunes area of influence is built out. The sphere of Influence is not within the City's jurisdiction, and Land Use designations are pending preparation of a Master Plan. The Master Plan will be submitted to ALUC for review at the time that it is prepared.

Comment C-5:

We urge your consideration of the Countywide Policies of the 2004 Riverside County Airport Land Use Compatibility Plan, the 2004 Bermuda Dunes Airport Land Use Compatibility Plan, and the 2005 Jacqueline Cochran Regional Airport Land Use Compatibility Plan in proposing land use designations for properties within the Airport Influence Areas of these two airports. Additionally, the California Airport Land Use Planning Handbook published by the State of California Department of Transportation, Division of Aeronautics, is an excellent resource that should be consulted in your efforts to provide for a General Plan that furthers the objectives of airport land use compatibility planning. We recommend that the chapter addressing "Responsibilities of Local Agencies" be reviewed.

Response C-5: Comment noted.

Comment C-6:

In situations where a jurisdiction's General Plan has not been determined by ALUC to be consistent with applicable Airport Land Use Compatibility Plans, ALUC is empowered to require submittal of all actions, regulations, and permits (such as land divisions and development of structures with a cumulative floor area of 20,000 square feet or greater) involving land within an Airport Influence Area for individual determinations of consistency or inconsistency. All major land use actions, with or without legislative actions such as general plan amendments, specific plans and specific plan amendments, and zoning changes, affecting land within the Airport Influence Areas of Bermuda Dunes Airport and Jacqueline Cochran Regional Airport are presently subject to ALUC review. ALUC reviews for conformance with ALUCP compatibility criteria, including land use intensity, noise, and height. (Once ALUC has determined a jurisdiction's General Plan to be consistent, only those projects involving general plan amendments, specific plans, specific plan amendments, ordinance amendments, or zoning changes are subject to ALUC review.)

Response C-6: Comment noted. See comment C-4.

Comment C-7:

The protection of airports from incompatible land use encroachments is vital to California's economic future. ALUCs were created by the State of California to work with local jurisdictions in a joint effort to provide for compatible land uses in the vicinity of public use airports. ALUC staff is available to assist the City in this effort in order to provide for a General Plan that is consistent with adopted Compatibility Plans, and would be happy to meet with you and City staff to discuss the General Plan and the ALUC review process at your convenience.

Response C-7: Comment noted.

D. SOUTH COST AIR QUALITY MANAGEMENT DISTRICT

Comment D-1:

Based on a review of the Draft EIR the lead agency has determined that the proposed project will achieve its greenhouse gas (GHG) reduction target of 10% below 2005 levels by 2020 and 28% below 2005 levels by 2035. Based on information presented on page IV-7 of the GHG Reduction Plan the lead agency established BAU using historical growth rates (2005 baseline data) within city limits. As a result, the lead agency applied this same growth rate to land area outside of city limits and in the project's sphere of influence (SOI). However, it does not appear that the land outside of the lead agency's jurisdiction and in the SOI (see Figure I-5 of Draft EIR) has a growth potential that is consistent with the growth rates assumed in the BAU analysis. Specifically, it does not seem appropriate to allocate the same growth rate to land in the city limits boundary and land in the SOI boundary given the existing lower density rural designation within the SOI. Therefore, the AOMD staff requests that in light of a recent court ruling regarding BAU analysis¹ the lead agency demonstrate that the BAU analysis properly captures the growth potential in the city's sphere of influence and provide clarification about the use of this rate to establish the project's BAU emissions value.

Response D-1:

The GHG Reduction Plan utilizes the growth rates as defined on page IV-7 of the Plan to specify the projected rate of growth for each sector based on historic data. The GHG Reduction Plan includes land uses within City limits only and excludes the SOI, as the City has no jurisdiction over these lands at this time. In the event that the SOI is annexed into the City, a SOI specific GHG Reduction Plan would need to be prepared, or the existing GHG Reduction Plan amended to address this increased territory.

As stated on page 39 of the La Quinta AQ/GHG Report prepared for the La Quinta General Plan Update, the air quality analysis assumes that full buildout of the proposed Land Use Plan occurs by 2035. This assumption is both reasonable and practical within City limits. As the commentor notes, full buildout of the SOI is also assumed for analysis purposes in order to estimate the potential impact to air quality. BAU for the SOI is based on the City's General Plan Update land use designations, and is in substantial conformance with the existing General Plan land use designation for that area as well as the County's Vista Santa Rosa Plan, which currently governs development within the SOI. As such, the land uses proposed for the SOI have been assigned for at least the past 10 years. Although the historic rate of growth within the SOI has been minimal, land within the City limit is nearly built out and the land within the SOI contains a majority of the developable land within the Planning Area. It is therefore expected that the SOI will be the next area of growth.

In order to evaluate impacts from implementation of the General Plan Update, full buildout of the Planning Area, including City Limits and the SOI is analyzed in the AQ/GHG Report and the EIR.

Comment D-2:

The lead agency indicates that the population, housing and employment growth rates in the GHG Reduction Plan were provided by the Southern California Association of Government (SCAG). However, the lead agency does not provide any quantitative analyses or measures to demonstrate that the project is consistent with the recent Sustainable Community Strategy (SCS) adopted by the SCAG. Therefore, the final CEQA document should provide a quantified analysis demonstrating consistency with the 2012 Regional Transportation Plan/SCS.

Response D-2:

Table 19 of the GHG Reduction Plan provides detailed information on the use of SCAG growth forecasts to project future year trends in demographics within the City of La Quinta. Growth rates in the GHG Reduction Plan are based on the "Draft Integrated Growth Forecasts" released May 2011 by SCAG. The "Draft Integrated Growth Forecasts" were subsequently used as the basis for establishing growth projections for the 2012 RTP/SCS. As such, growth rates set forth within the GHG Reduction Plan are consistent with the growth forecasts presented by SCAG in the RTP/SCS.

Comment D-3:

The lead agency's operational air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NOx, SOx, CO, VOC, PM10 and PM2.5 emissions impacts. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this large source of emissions. Specifically, the lead agency requires nominal mitigation measures in the Draft EIR that lack emission reduction targets and specificity relative to the mobile source emissions. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating additional transportation mitigation measures from the greenhouse gas quantification report² published by the California Air Pollution Control Officer's Association and by revising mitigation measures 1 through 6 on page III-35 of the Draft EIR to provide specific emission reduction targets in the Final EIR. Further, the lead agency should be mindful of significant mobile source reductions that are needed in the near future for the South Coast Air Basin to achieve Federal Clean Air Standards by 2023 and 2030³.

Response D-3:

As stated on page III-33 of the DEIR, the General Plan requires adoption of the GHG Reduction Plan in order to mitigate for impacts to air quality resulting from transportation, among other sectors. Feasible mitigation measures have also been included in the DEIR. Pages V-6 through V-8, and V-10 of the GHG Reduction Plan identify specific transportation

related measures that will substantially reduce air quality emissions (criteria pollutants and GHGs). These include measures set forth in the CAPCOA Report. Quantifiable reductions for the transportation sector are provided in Table 26 of the GHG Reduction Plan. While the reduction to GHG's are highlighted and presented in terms of CO2e reduction, it should be understood that these measures will also substantially reduce emissions of criteria pollutants. Adoption of the comprehensive GHG Reduction Plan is expected to be sufficient to limit air quality emissions to the greatest extent practicable.

Comment D-4:

The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.

Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements.

Response D-4:

Comment noted. Mitigation measure #2 on Page III-33 of the DEIR will be amended pursuant to the above comment.

E. CITY OF COACHELLA

Comment E-1:

The Preferred Alternative Land Use Plan (Exhibit I-5) shows the entire geographic area bounded by Jackson Street, Airport Boulevard, Harrison Street and the Coachella City boundary as "Low Density Residential" except for two areas of "Community Commercial" at SW corner of Van Buren and Avenue 53, and on the west side of Harrison Street between Airport Boulevard and Avenue 60. (north of Avenue 54). The City is concerned about this blanket designation for the following reasons.

- a) The preferred land use plan deviates from the Vista Santa Rosa Land Use Concept Plan (VSRLUCP) with respect to the clustering of densities at the Village Center near Coachella Valley High School. The City of Coachella believes that "Medium High Density Residential", "High Density Residential", "Village Center" and "Community Center" uses identified in the VSRLUCP at Calhoun Street and Airport Boulevard are beneficial to the long term quality of life in the area. The City of Coachella would encourage the creation of a neighborhood center similar to what is envisioned in the VSRLUCP in order to reduce vehicular trips for the commercial needs of nearby residents, and to have a cluster of density near the existing High School to promote walking routes to school.
- b) The intersection of Van Buren Street and Avenue 52 in Coachella has approximately 160 acres of undeveloped land designated for General Commercial use. Commercial land developers have studied this intersection future node for regional commercial and medical office uses. This area has the potential to become a significant employment center. The City of Coachella is in favor or designating the land north of Avenue 53 and east of Calhoun Street to include "Medium Density" and "High Density" Residential uses to cluster homes near this future employment center.

Response E-1:

Comment noted. As described on page I-19, the Low-Density Residential land use designation applied to the area described above and throughout the eastern Sphere-of-Influence is assigned in anticipation of the preparation of a Master Plan required prior to annexation of the area. Page III-129 indicates that, prior to annexation into the City, the General Plan will require the preparation of a Master Plan of development to further evaluate the plan's consistency with the Vista Santa Rosa (VSR) Land Use Concept Plan and to assure that future development reflects the desires of the community.

The Preferred Land Use Map provides for General Commercial development at several locations, including those at the intersection of Airport Blvd. and Monroe St., the intersection of Avenue 53 and Van Buren St., and along Harrison St. between Airport Blvd. and Avenue 60. Additional commercial centers, including those proposed in the Vista Santa Rosa Land Use Concept Plan will be evaluated as part of the Master Plan process.

Comment E-2:

The proposed roadway diagram for Harrison Street south of Airport Boulevard is shown as a Major Arterial consisting of six lanes with a raised median. Please note that the City of Coachella has approved a policy document for Harrison Street between Avenue 54 and Highway 111 ("Harrison Street Corridor Study") that calls for a de-emphasized roadway with four lanes of travel and parallel parking on the street. It is our desire to shift regional traffic onto Van Buren Street and Calhoun Street as future north-south arterial streets within Coachella. In addition to anticipated future commercial uses and possible expansion of the Augustine Casino, the Van Buren and Calhoun Street corridors will provide connectivity between planned community parks at Van Buren and Avenue 49 (Rancho Las Flores) and at Avenue 50 and Calhoun Street (La Colonia Park). The City of Coachella would encourage policies that would require a transitioning section of Harrison Street between Avenue 58 and Airport Boulevard to reduce the number of lanes for north-bound traffic into Coachella

Response E-2:

Comment noted. Traffic modeling was conducted to evaluate roadway conditions at General Plan buildout (year 2035); the results are shown in Table III-48 of the Draft EIR. The La Quinta General Plan traffic model is a focused version and extension of the latest RivTAM model. The analysis conducted by the City (and the County) indicates that Harrison Street between Airport Boulevard and Avenue 58 will operate at an unacceptable Level-of-Service (LOS F) even when constructed as an 8-lane Augmented Major roadway with a capacity of 76,000 ADT. While this segment is south of the Coachella segment between Avenue 54 and Highway 111, the projected traffic volumes and existing and long-term circulation pattern imply that traffic volumes higher than those that can be accommodated on a divided four lane roadway could eventually occur along the referenced Coachella segment of Harrison Street.

Ongoing focus and coordination of Harrison Street operations will be required to assure that the La Quinta and other segments operate at LOS D or better in 2035. Prior studies conducted by the County raised the potential of grade-separated intersections to enhance capacity. The General Plan Update identifies additional recommendations for increasing peak hour traffic volumes, including the implementation of well-coordinated traffic signals, improved access control, and uniform travel speeds.

The City of Coachella comment indicates that it will shift Harrison Street traffic west to reduce demand for capacity along the Coachella segment of Harrison Street. However, it should be noted that the La Quinta General Plan designates Van Buren Street as a 4 lane Primary Arterial within a 108-foot right-of-way, which substantially conforms with the County General Plan Circulation Element for this roadway. To the extent projected future Harrison Street traffic volumes can be shifted westward to Van Buren Street, neither the La Quinta nor County General Plans designate this roadway with sufficient capacity to absorb long-term traffic projected for Harrison Street.

Comment E-3:

The draft Circulation Element diagram as shown in Exhibit III-18 identifies the major roadway arterials on the traditional section lines throughout La Quinta's sphere of influence (i.e., Avenue 54, Airport Boulevard, Jackson Street, Van Buren Street, Avenue 58, and Avenue 60, etc.). While a majority of Coachella's arterials have not been developed, we see this as an opportunity to enhance connectivity by including the ½mile connecting roadways as much as possible into the General Plan network. Accordingly, the City of Coachella will be including Avenue 53, Avenue 55, Avenue 57, Avenue 59, and Avenue 61 into the Circulation Element. Similarly, we will be including Calhoun Street, Frederick Street and Shady Lane as north-south arterial streets to distribute the traffic in a manner that would allow all arterial streets to be no larger than a four-lane roadway. The City of Coachella would encourage smaller block distances between arterial streets to discourage highway-type arterials and encourage pedestrian-friendly streets that provide access to local commercial and public uses within identifiable neighborhood centers. The City has an over-arching to improve the health of our residents through the built environment by promoting walkable communities, improving opportunities for short distance non-motorized travel, and improve access to parks and recreational uses.

Response E-3:

Comment noted. The City of La Quinta has and expects to continue to see larger-scale master planned development in the southern quadrant of the City. It should also be noted that the City largely provides for low-density residential development in this area, which will limit the need for a General Plan roadway network along the mid-section lines, although their development is not precluded if they are integral parts of overall master planning in this area. With the exception of Harrison Street, none of the major roadways planned in the southeast quadrant of the City are planned to be larger than 4 lanes divided. Also, as previously stated in Response E-1, this area will be master planned, and roadway designations finalized through that master plan process, so that it will relate to the land use pattern established in the master plan.

F. COACHELLA VALLEY WATER DISTRICT

Comment F-1: Where applicable throughout the DEIR, references should be made to the 2010 Coachella Valley Water Management Plan Update (approved in January 2012), the Coachella Valley Multiple Species Habitat

Conservation Plan, and the Thomas E. Levy Groundwater Recharge

Facility.

Response F-1: Comment noted.

Comment F-2: <u>Page M-9, Environmental Summary Matrix</u>: Under the "Existing

Conditions" heading, "Hydrology" is misspelled.

Response F-2: Comment noted. Correct spelling is hereby incorporated by reference.

Comment F-3: Please revise first sentence under "Hydrology" to state: "Analysis and

design of regional flood control structures is the responsibility of CVWD".

Response F-3: Comment noted. Changes are hereby incorporated by reference.

Comment F-4: Please revise the last sentence of the first paragraph under "Hydrology" to

state" ... the Bear Creek System, the East La Quinta Channel System, Dike

No. 2, Guadelupe Dike, and Dike No. 4. "

Response F-4: Comment noted. Changes are hereby incorporated by reference.

Comment F-5: In reference to the second paragraph under the "Project Impacts" heading,

please note that the portion of the Coachella Valley Stormwater Channel within the Planning Area is not a "levee", and most of this section has

slope protection.

Response F-5: Comment noted. Changes are hereby incorporated by reference.

Comment F-6: Page M-10, Environmental Summary Matrix: In the last sentence of the

third paragraph under the headings "Existing Conditions" and "Water Resources/Quality", please revise to read: "CVWD estimates the annual

overdraft for 2010 to be 7,457 acre-feet. "

Response F-6: Comment noted. Changes are hereby incorporated by reference.

Comment F-7: Page II-12: Please revise the third paragraph to read "... which drains an

approximate 1,069-square-mile watershed at Indio ... " or " ... which drains an approximate 1,525-square-mile watershed at the Salton Sea ... ".

Response F-7: Comment noted. Changes are hereby incorporated by reference.

In the last paragraph, please replace "Whitewater River" with "Whitewater Comment F-8:

River Stormwater Channel".

Response F-8: Comment noted. Changes are hereby incorporated by reference.

Comment F-9. Page II-13: Under the heading "Domestic Water Resources", please revise the second sentence to the following: "It uses wells to extract groundwater which naturally recharges from mountain runoff. Natural recharge is supplemented by replenishment programs supplying supplemental water to the Thomas E. Levy Groundwater Recharge Facility near Dike No. 4 and at the Martinez Canyon Pilot Groundwater Recharge Facility near

Martinez Canyon. "

Response F-9: Comment noted. Changes are hereby incorporated by reference.

Comment F-10: Under the heading "Whitewater River Subbasin", please revise the last

sentence of the first paragraph to state " ... Lower Whitewater River

Subbasin Area of Benefit. "

Response F-10: Comment noted. Changes are hereby incorporated by reference.

Comment F-11: In the first sentence of the second paragraph, please revise to read "...

groundwater use in the Whitewater River Subbasin has been steadily

increasing to a point where demand has exceeded natural supplies. "

Response F-11: Comment noted. Changes are hereby incorporated by reference.

Comment F-12: Page II-20: In the third sentence of the first paragraph under "Domestic

> Water", please revise to read "... and south and east of the Planning Area at the Thomas E. Levy Groundwater Recharge Facility near Dike No. 4 and at the Martinez Canyon Pilot Groundwater Recharge Facility near

Martinez Canyon. "

Response F-12: Comment noted. Changes are hereby incorporated by reference.

Comment F-13: In the last two sentences of the paragraph under "Wastewater Services",

please replace "Mid-Valley Water Reclamation Plant" with "Water

Reclamation Plant No.4".

Response F-13: Comment noted. Changes are hereby incorporated by reference.

Comment F-14: Page III-104: In the first sentence of the paragraph under "Regional

Stormwater Management", please revise to read: "Analysis and design of

regional flood control Structures is the responsibility of CVWD".

Comment noted. Changes are hereby incorporated by reference. Response F-14:

Comment F-15: Please revise the second to last sentence to read " ... include the Coachella

> Valley Stormwater Channel, Whitewater River Stormwater Channel, the La Quinta Evacuation Channel, the Bear Creek System, the East La

Quinta Channel System, Dike No. 2, Guadalupe Dike, and Dike No. 4. "

Response F-15: Comment noted. Changes are hereby incorporated by reference.

Comment F-16: Please revise the first four sentences in the first paragraph under

"Whitewater River/Coachella Valley Stormwater Channel" to read: "The Whitewater River, which flows into the Coachella Valley Stormwater Channel in the Planning Area, is the principal drainage course in the City, extending through the Coachella Valley for 50 miles, with an average cross-section of 350 feet. The Channel is generally dry, but may be inundated during storm events. Most of the Coachella Valley Stormwater Channel sections within the City have reinforced slope protection; the

remaining portions are protected by unreinforced earthen berms. "

Response F-16: Comment noted. Changes are hereby incorporated by reference.

Comment F-17: Please revise the first sentence of the second paragraph to read: "The

> aforementioned reinforced slopes and remaining unreinforced earthen banks are classified by FEMA as "Provisionally Accredited Levees",

indicating that they provide protection from the 100-year flood. "

Response F-17: Comment noted. Changes are hereby incorporated by reference.

Page III-105: Please revise the last sentence under "Bear Creek System" to Comment F-18:

> read: "CVWD has applied for FEMA accreditation of the Bear Creek Channel System including the training dike, and is awaiting receipt of the

formal accreditation letter. "

Response F-18: Comment noted. Changes are hereby incorporated by reference.

Comment F-19: In reference to the last sentence of the paragraph under "Oleander

> Reservoir", the Standard Project Flood elevation is projected to be 54 feet at the reservoir; please verify 44-foot elevation associated with the 100-

year flood.

Response F-19: Comment noted.

Comment F-20: Page III-106: In reference to the first two sentences of the first paragraph

under "Dikes", please note that the dikes were constructed to protect

agricultural lands.

Response F-20: Comment noted. Comment F-21: Also, the Eastside Dike is not located within an area covered by the City's General Plan Update.

Response F-21: Comment noted. Reference to Eastside Dike is hereby deleted.

Comment F-22: Please revise the first two sentences of the first paragraph under "Levee Failure and Seiching " to read: "There are several major stormwater or irrigation facilities located in the Planning Area including the Coachella Valley Stormwater Channel, Coachella Canal, and Lake Cahuilla."

Response F-22: Comment noted. Changes are hereby incorporated by reference.

Comment F-23: In the first sentence of the second paragraph, please replace "sand levees" with "banks" or "levees".

Response F-23: Comment noted. Changes are hereby incorporated by reference.

Comment F-24: Page III-238: Please revise the second sentence of the third paragraph under "Existing Conditions" to read: "Although Colorado River water is one of the Coachella Valley's main sources of water, it has elevated levels of salinity. This water has been cited as contributing to the elevated salinity levels found in the Valley."

Response F-24: Comment noted. Changes are hereby incorporated by reference.

Comment F-25: Page III-239: Please revise the last sentence of the first paragraph under "Thermal Subarea" to read: " ... increased pumpage has lowered groundwater levels in the lower portion of the Whitewater River subbasin."

Response F-25: Comment noted. Changes are hereby incorporated by reference.

Comment F-26: Please revise the first sentence of the third paragraph to read: "The upper and lower aguifer zones of the Thermal subarea ... "

Response F-26: Comment noted. Changes are hereby incorporated by reference.

Comment F-27: Please revise the first sentence under "Regional Water Supply and Demand" to read: "The Coachella Valley's principal domestic water source is groundwater."

Response F-27: Comment noted. Changes are hereby incorporated by reference.

Comment F-28: Please revise the first and second sentences under "Regional Water Supply" to read: "Domestic water is provided in the City and most of the sphere by CVWD. Groundwater is the primary source for this water supply."

Response F-28: Comment noted. Changes are hereby incorporated by reference.

Comment F-29: In the first sentence of the second paragraph, please add "Area of Benefit" after "Subbasin".

Response F-29: Comment noted. Changes are hereby incorporated by reference.

Comment F-30: Please revise the last sentence of the third paragraph to read: "...the annual balance in the Area of Benefit for 2010 was estimated to be -7,457 acre-feet. "The cumulative overdraft for the Area of Benefit through 2010 is estimated to be 4,497,609 acrefeet. "The cumulative overdraft for the Area of Benefit through 2010 is estimated to be 4,497,609 acrefeet."

Response F-30: Comment noted. Changes are hereby incorporated by reference.

Comment F-31: Under "Historic and Current Consumption", please add "Area of Benefit" after "Subbasin".

Response F-31: Comment noted. Changes are hereby incorporated by reference.

Comment F-32: Please revise the title of Table 111-50 to "Coachella Valley Water District Annual Water Production Within the Lower Whitewater River Subbasin Area of Benefit."

Response F-32: Comment noted. Changes are hereby incorporated by reference.

Comment F-33: Under "Domestic Water Facilities", please update data to include the following: "CVWD has 102 active wells, 59 reservoirs, and in 2011 delivered 102,805 acre-feet of water to a population of 286,240."

Response F-33: Comment noted. Changes are hereby incorporated by reference.

Comment F-34: Please replace "... and the Mission Creek subbasins ... " with "... and the Mission Creek Subbasin Areas of Benefit" in the second and third paragraphs on this page."

Response F-34: Comment noted. Changes are hereby incorporated by reference.

Comment F-35: <u>Page III-244</u>: Please revise the heading "Reclaimed Water/Tertiary Treated Water" to "Recycled Water/Tertiary Treated Water".

Response F-35: Comment noted. Changes are hereby incorporated by reference.

Comment F-36: In the second sentence under this heading, please revise to state " ... of

which two have facilities to treat wastewater ... " and add this sentence after the second sentence: "A third CVWD water reclamation plant produces secondary treated water suitable for irrigation where uses are

restricted. "

Response F-36: Comment noted. Changes are hereby incorporated by reference.

Comment F-37: Page III-245: In the next to last sentence of the first paragraph on the page.

please replace "turn" with "turf".

Response F-37: Comment noted. Changes are hereby incorporated by reference.

Comment F-38: Page 111-246: Please revise the fourth and fifth sentences of the second

paragraph under "Water Quality" to read: "In some areas, low levels of naturally-occurring arsenic have been found. CVWD has three ion exchange treatment facilities for arsenic removal; these are located in the

Mecca and Thermal areas. "

Response F-38: Comment noted. Changes are hereby incorporated by reference.

Comment F-39: Page 111-247: Please revise the second and third sentences under "Total

Dissolved Solids" to read: "The secondary MCL for TDS includes an upper level of 1,000 milligrams per liter (mg/L) and a short-term level of 1,500 mg/L. Based on CVWD domestic well monitoring data for 2009,

TDS levels ranged from 150 to 980 mg/L."

Response F-39: Comment noted. Changes are hereby incorporated by reference.

Comment F-40: Under "Nitrates", please remove the "s" from "commons" in the second

sentence of the first paragraph.

Response F-40: Comment noted. Changes are hereby incorporated by reference.

Comment F-41: Please revise the first sentence of the fourth paragraph on

the page to read: "The primary water quality issues in the Coachella Valley are salinity and nitrates." Please add "River" after "Whitewater" in

the second sentence.

Response F-41: Comment noted. Changes are hereby incorporated by reference.

Comment F-42: Page 111-252: Please replace "reclaimed" with "recycled" in the last

sentence of the first paragraph under "Impacts to Water Supply

Resources".

Response F-42: Comment noted. Changes are hereby incorporated by reference.

Comment F-43: Page III- 254: In the third sentence of the first paragraph, revise to read "... established thresholds for domestic water..." and place a comma after

"chromium-6" in the last sentence.

Response F-43: Comment noted. Changes are hereby incorporated by reference.

Comment F-44: In the third sentence under "Nitrates", please revise to read "... nitrate

concentrations in domestic water provided by CVWD range from "not

detected" to a maximum of 40 mg/L."

Response F-44: Comment noted. Changes are hereby incorporated by reference.

Comment F-45: Please remove the "s" from "impacts" in the first sentence

of the first full paragraph.

Response F-45: Comment noted. Changes are hereby incorporated by reference.

Comment F-46: Exhibit 111-10: The Coachella Valley Stormwater Channel is mislabeled

as the "Whitewater River".

Response F-46: Comment noted. Changes are hereby incorporated by reference.

G. ENDO ENGINEERING for HOFFMAN LAND DEVELOPMENT COMPANY

Note: The Endo Engineering comment letter was submitted with and is associated with a separate letter provided by Hoffman Land Development Company, comments from which are addressed separately in Comment Letter M, below.

Comment G-1:

As shown in General Plan Exhibit II-10, EIR Exhibit III-20, and Table 10 of the TlA, future traffic projections are not provided for several General Plan roadway segments that are critical to the development of the Travertine Specific Plan. Future traffic projections are needed for: (1) Avenue 62, west of Madison Street; (2) Avenue 58, west of Madison Street; (3) Jefferson Street, north of Travertine; (4) Madison Street, north of Avenue 62; and (5) Avenue 60, west of Madison Street.

Section 6.3 of the TIA (Page 52) indicates that the growth in raw LQTAM volumes between the year 2009 and the year 2035 was added to the existing 24-hour volumes from CVAG to obtain forecast year 2035 daily volumes. However, future traffic projections were not evaluated for some General Plan roadway segments that were included in the CVAG "Traffic Census Report". For example, CVAG provided existing daily traffic count data for three segments along Airport Boulevard (east of Madison Street, east of Monroe Street, and east of Jackson Street). Future traffic projections were not provided in the TIA for these roadway segments.

It can be seen from General Plan Exhibit II-10, EIR Exhibit III-20, and Table 10 of the TlA, that numerous master planned roadway segments were not included in the CVAG "Traffic Census Report" and therefore have no future traffic projection. Without future traffic projections, the adequacy of the master planned roadway classifications for many General Plan roadway segments, particularly those in the developing areas of southeast La Quinta, cannot be verified.

Future traffic projections are necessary for all of the General Plan roadway links to ensure that future traffic studies properly address General Plan buildout traffic conditions. Will year 2035 LQTAM daily traffic projections be made available to enable future traffic studies to evaluate General Plan buildout traffic volumes? As a minimum, the raw LQTAM volumes for the year 2009 and the year 2035 should be provided for those roadway links where no count data was provided in the CVAG "Traffic Census Report".

Response G-1:

Comment noted. As is evident from Exhibit II-9 of the Draft General Plan and Exhibit II-17 of the Draft EIR, existing traffic volumes in the southeast quadrant of the City are quite low and traffic on many of these segments have not been counted by CVAG. However, as is well understood by traffic engineers and planners, intersections are the most constrained portions of the roadway network and data were collected for 37 intersections, including those in the vicinity of the Travertine Specific Plan project. With these measured intersection volumes, including turning movements, roadway segment volumes are interpolated by the City traffic model. The traffic model will be made available to other traffic engineers for their use in conducting future project-specific traffic analysis. It should also be noted that the cited segment of Jefferson Street primarily serves development in the vicinity of Lake Cahuilla, The Quarry and the Travertine and Green (Coral Canyon) Specific Plans.

Comment G-2:

In Appendix H of the DEIR, page 12 of the TIA refers readers to Appendix A for the traffic count data used in the traffic study. Appendix A of the TIA was not provided on the City website and should be made available for review.

Response G-2:

Comment noted. An electronic copy of the subject technical appendix was provided to the commentor on September 9, 2012.

Comment G-3:

In Appendix H of the DEIR, page 32 of the TIA references the "Model Documentation and Validation Report" (dated February, 2011) prepared by Iteris, Inc. This report is critical and should be provided on the City website or at a minimum made available upon request. Based upon the existing CVAG counts and the portion of the land in southeast La Quinta that has been developed to date, it appears that the future traffic projections along Madison Street are substantially higher than expected. The rationale for the additional future traffic is not provided in the TIA. Consequently, the calibration of the model in this area is of particular interest and should be reviewed.

Response G-3:

Comment noted. An electronic copy of the subject model documentation and validation was provided to the commentor on September 9, 2012. The LQTAM is a focused version of the RivTAM regional traffic model. As is made clear in the Circulation Element and the Draft EIR and TIA, traffic data ("rationale") include current traffic, existing and planned land uses, and a variety of socio-economic data. As noted above, the LQTAM version of the RivTAM model will be available to qualified and County-approved RivTAM modelers in preparing other traffic analysis in the City and its Sphere-of-Influence, including project-specific analyses.

Comment G-3A: Specific Comments Related to the Travertine Specific Plan

The Travertine Specific Plan was originally approved in 1994 with a total trip generation of 27,300 daily trips and included the development of 2,300 dwelling units, 100,000 square feet of retail, and a 500-room hotel. Access to the Travertine Specific Plan was planned via three streets, the primary access from Madison Street, and minor access from Avenue 62 and from Jefferson Street/Avenue 58.

In 2008, a proposed amendment to the Travertine Specific Plan included 1,400 dwelling units and a 500-room hotel generating 17,390 daily trips. The amended proposal represented a 39 percent decrease in dwelling nits, and a 36 percent decrease in total trip generation. From a capacity perspective, the Travertine Specific Plan area could be served by two two-lane roadways, or one 4-lane roadway. In view of the high cost of constructing off-site roadway improvements to provide access to the project site, it is critical that the access be appropriately sized. Therefore, the access streets of Madison Street, Jefferson Street, and Avenue 62 near the Travertine Specific Plan need to be carefully evaluated to ensure that a sufficient, but not excessive capacity is provided.

Response G-3A:

Comment noted. The City has been working with the project proponent and will continue to cooperate in the proponent's planned project revisions. Until such time as the City approves new land uses on the Travertine site, current entitlements must be used to model area traffic. As the City has consistently indicated, it will consider a revision to the City Circulation Element and Roadway Classifications concurrent with the submittal of a complete application for amendment to the approved Travertine Specific Plan.

Comment G-4: *Madison Street*

In Exhibit 5 of the TIA, the existing turning movement volumes for the intersection of Madison Street and Avenue 60 (Intersection 32) appear to be too high, unless the volumes represent primarily construction traffic. The six existing homes accessed via Avenue 60, west of Madison Street, should not generate 66 morning peak hour and 43 evening peak hour trips on this segment of Avenue 60. Furthermore, the primary traffic movement associated with these residents should be to/from the north, not to and from the east via Avenue 60. Traffic count data from 2008 that shows 18 vehicles in the morning peak hour and 6 vehicles in the evening peak hour on this leg of Avenue 60. Given the questionable existing traffic count data, the existing turning movements at this intersection should not be used as the basis to project the future turning movements. Doing so results in unrealistically high projections for Avenue 60, west of Madison Street. It also results in more northbound vehicles on Madison Street turning left into a relatively small low-density residential area via Avenue 60 than

continuing northbound through the intersection toward the commercial and employment opportunities in the more developed portions of La Quinta.

Response G-4:

Please see the TIA technical appendices, which have been provided to the commentor. The volumes cited for Madison Street and Avenue 60 are very low and subject to misinterpretation. Rather than surprising, the travel patterns through this intersection appear reasonable given the substantial labor market in the Thermal/Mecca area that are likely to support residential and golf course developments in the vicinity and elsewhere in the City.

Comment G-5:

General Plan Exhibit II-2 and EIR Exhibit III-18 incorrectly identify Avenue 62 as a modified 2-lane divided secondary arterial between Madison Street and Monroe Street. However, Figure 4 of the TIA correctly shows that Avenue 62, between Madison Street and Monroe Street, is a 2-lane undivided Modified Collector Street.

Response G-5:

Comment noted. The assignment of the "Modified Secondary" classification to this road segment was determined to be more appropriate given the existing land uses and assignments. It requires an additional four feet in right-of-way compared to the "Collector" classification. It should again be noted that the City will review a request to reclassify this roadway segment concurrent with the processing of the forthcoming Travertine Specific Plan amendment.

Comment G-6:

General Plan Exhibit II-2 and EIR Exhibit III-18 incorrectly identify Monroe Street, between Avenue 60 and Avenue 62, as a four-lane undivided Secondary Arterial. This segment of Monroe Street is currently classified as a Modified Secondary Arterial A (which is a two-lane divided roadway with a lower capacity that a four-lane undivided roadway).

Response G-6:

Comment noted. The higher traffic volumes projected along this segment required the provision of corresponding roadway capacity; hence the assignment of the "Secondary Arterial" classification to this segment. Please note that referenced exhibits (General Plan Exhibit II-2 and EIR III-18) incorrectly characterizes the "Secondary Arterial" as an undivided roadway. As can be seen throughout the Draft Circulation Element and Draft EIR, Figure II-3 of the Draft General Plan and Exhibit III-19 provide the correct (divided) roadway cross section for this roadway.

Comment G-7:

General Plan Exhibit II-2, EIR Exhibit III-18, and the TIA Figure 4 identify Madison Street, extending between Avenue 60 and Avenue 62 as a Modified Secondary Arterial A. However, all of the future base maps in the TIA incorrectly show a break in Madison Street where it crosses the

dike, south of Avenue 60. The future base maps should show that Madison Street will be connected between Avenue 60 and Avenue 62.

Response G-7:

Comment noted. Limited portions of the subject segment have yet to be built, and the precise future alignment of Madison Street over Dike 2 is yet to be determined

Comment G-8:

TIA Figure 6 shows an existing bicycle route passing through the intersection of Madison Street and Avenue 62. The intersection of Madison Street and Avenue 62 does not currently exist. Therefore, a bicycle route through this intersection does not currently exist. On the City's website, the "City of La Quinta Bike Map" only extends south to Avenue 60. Therefore, it does not show an existing bike route extending through the intersection of Madison Street and Avenue 62.

Response G-8:

Comment noted. Changes are hereby incorporated by reference.

Comment G-9:

General Plan Table II-12, EIR Table III-48, and Table 10 of the TIA show Madison Street (between Avenue 54 and Airport Blvd.) with a projected future traffic volume of 47,529 vehicles per day. This future projection is much higher than expected, based on development trends and trip generation studies in this area. Since the land south of this point is nearly 50 percent developed and the CVAG peak season daily traffic count for Madison Street is currently less than 10,000 vehicles per day, it appears unlikely that the General Plan buildout daily volume will exceed 30,000 ADT.

The major specific plans in this area have been developing at approximately 50 percent of the densities permitted under the existing entitlements. In addition, the trip generation studies of developments such as PGA West and Trilogy have identified trip-generation rates consistent with age-restricted senior residential developments. The trip generation of residential developments in this area has been approximately 30 percent of the trip generation rates associated with traditional single-family residential dwellings. Extensive traffic counts at the access points to PGA West have identified a trip generation rate that is 35 percent of the traditional single-family residential trip generation rate, even though PGA West is not an age-restricted community.

Was the trip generation assumed in the modeling for development in this area based upon the entitlements, census data, or the actual development that has occurred? How did the calibration run for existing development compare to the existing traffic volumes for Madison Street, between Avenue 54 and Airport Blvd.? The calibration run probably shows existing traffic projections much higher than the existing traffic count

data. This would indicate that both the residential development intensities and trip-generation rates assumed for this area in the model were too high.

Response G-9:

Please see the TIA technical appendices, which have been provided to the commentor. In addition to the substantial vacant land in this southeast quadrant remaining to develop, the County General Plan assigns land uses to the east and south that also make major contributions to area traffic. The model also recognizes that Airport Boulevard terminates at Madison Street and westbound traffic is channeled onto Madison Street at this point. The Draft EIR and TIA, traffic data include current traffic, existing and planned land uses, and a variety of socio-economic data go into the model's trip generation. As noted above, the LQTAM version of the RivTAM model will be available to qualified and County-approved RivTAM modelers in preparing other traffic analysis in the City and its Sphere-of-Influence, including project-specific analyses.

Comment G-10:

Figure 11 of the TIA shows year 2035 turning movement projections at the intersection of Madison Street and Avenue 60 (Intersection 32) that are not reasonable for this location. They indicate that approximately one-half of the northbound traffic on Madison Street turns west at Avenue 60. The northbound left-turn volume (from Madison Street onto Avenue 60) is projected to exceed the northbound through volume during the evening peak hours. At this intersection there should be very little traffic making a northbound left-turn movement since the west leg of Avenue 60 only serves a very small low-density residential development area.

Response G-10:

Please see the TIA technical appendices, which have been provided to the commentor. In addition to the largely undeveloped residential land located at the northwest corner of this intersection, an entrance to the Coachella Valley Recreation and Parks District regional park will be provided. As noted above, the Draft EIR and TIA, traffic data include current traffic, existing and planned land uses, and a variety of socio-economic data go into the model's trip generation. As noted above, the LQTAM version of the RivTAM model will be available to qualified and County-approved RivTAM modelers in preparing other traffic analysis in the City and its Sphere-of-Influence, including project-specific analyses.

Comment G-11:

Figure 13 of the TIA shows enhanced intersection treatments at Intersection 32 required because the traffic volume assigned to Avenue 60, west of Madison Street, was unrealistically high. There is minimal development planned west of Madison Street (low-density residential uses) with access to Madison Street opposite Avenue 60. Furthermore, Avenue 60, west of Madison Street is constructed as a local street with 36 feet of pavement that would not accommodate the four lanes of through traffic and dual eastbound left-tum lanes shown in Figure 13. There is a large development planned west of the existing Andalusia development,

but its future access to Madison Street is planned midway between Avenue 60 and Avenue 58, not at Avenue 60.

Response G-11: Comment noted. Please see Response G-10, above.

Comment G-12: Page 40, 41, and 50 of the TIA, describe enhanced improvements recommended for Intersection 32 (Madison Street and Avenue 60). See Comment 10 and 11. This recommendation should be revised because the assumptions in the model for this intersection are not correct.

Response G-12: Please see Response G-10, above.

Comment G-13: Avenue 62

General Plan Table II-12, EIR Table III-48, and Table 10 of the TIA show a future volume of 9,624 vehicles per day for Avenue 62, between Madison Street and Monroe Street. However, Figure 11 shows that very little peak hour traffic is projected on Avenue 62, immediately west of Monroe Street (only 90 evening peak hour trips or approximately 1,100 daily trips). This seems to indicate that essentially all of the 9,624 vehicles per day were assigned to Avenue 62 from adjacent future land uses located south of Avenue 62 and traveled west to Madison Street then north to Avenue 60. The Keck property is located south of Avenue 62 and west of Monroe Street. It is our understanding that future development plans for the Keck property included access primarily to Monroe Street, south of Avenue 62. Only minimal emergency access was planned from the Keck property to Avenue 62, west of Monroe Street. The location of the node connectors from the Keck Property to Avenue 62 and/or Monroe Street were not documented in the TIA or the DEIR. However, a nodal connection should not be assumed between the Keck property and Ave 62.

Response G-13:

Please see the TIA technical appendices, which have been provided to the commentor. The County General Plan assigns land uses to the east and south that also make major contributions to area traffic. In addition to the largely undeveloped residential land located to the northwest the existing Lake Cahuilla County Park and the future Coachella Valley Recreation and Parks District regional park will draw traffic in this direction. As noted above, the Draft EIR and TIA, traffic data include current traffic, existing and planned land uses, and a variety of socio-economic data go into the model's trip generation. As noted above, the LQTAM version of the RivTAM model will be available to qualified and County-approved RivTAM modelers in preparing other traffic analysis in the City and its Sphere-of-Influence, including project-specific analyses.

Comment G-14: General Plan Table II-12, EIR Table III-48, and Table 10 of the TIA incorrectly identified Avenue 62, between Madison Street and Monroe

Street, as a 4-lane Modified Collector with a daily capacity of 28,000 vehicles per day, rather than a 2-lane Modified Collector with a daily capacity of 14,000 vehicles per day. If the traffic network in the model incorrectly assumed the speed for a four-lane roadway for Avenue 62, between Madison Street and Monroe Street, it would attract more future traffic than the correct two-lane Modified Collector designation resulting in a future volume projection that is unrealistically high.

Response G-14:

Comment noted. It was determined that following the traffic analysis, the capacity of a "Modified Collector" (2 lanes divided/84-foot right-of-way) was sufficient to meet future demand and that the larger roadway was not warranted.

Comment G-15:

Figure 11 of the TIA shows a morning plus evening peak hour volume for Intersection 37 (Monroe Street at Avenue 62) of 26 in the eastbound direction, and 3 in the westbound direction. How was this traffic distribution determined? The atypical directional split seems to imply that all vehicles are going eastbound on Avenue 62 past Monroe Street in the peak hours and essentially no vehicles return in the westbound direction on Avenue 62 in the peak hours.

Response G-15:

As noted above, such small volumes have a higher degree of variance from existing and projected large volume flows. Please see the TIA technical appendices, which have been provided to the commentor. As noted above, the Draft EIR and TIA, traffic data include current traffic, existing and planned land uses, and a variety of socio-economic data go into the model's trip generation. As noted above, the LQTAM version of the RivTAM model will be available to qualified and County-approved RivTAM modelers in preparing other traffic analysis in the City and its Sphere-of-Influence, including project-specific analyses.

Comment G-16:

Figure 12 of the TIA shows the future lane geometries for Intersection 37 (Monroe Street at Avenue 62) with two westbound through approach lanes opposite a single westbound exit lane on Avenue 62 serving a peak hour westbound through volume of only 3 vehicles per hour. As a Modified Collector, Avenue 62 will only provide one through lane in each direction between Monroe Street and Madison Street.

Response G-16:

As noted, the major influences on future traffic at this intersection are County-assigned land uses to the east. It should be noted that the originally recommended improvements were modest and for the westbound traffic relied on combined through-right and combined through-left lanes, which adequately address projected General Plan 2035 buildout volumes. The final design has a limited effect on capacity, especially in light of the overall future volumes. Hence, the change to a single combined left-through lane and a dedicated right turn lane was

ultimately recommended for this intersection. Signalization will only occur when and if warranted. It should be noted that the Circulation Element provides the option of implementing a two lane roundabout at this intersection to meet buildout future needs.

Comment G-17:

Figure 12 and 13 of the TIA show that Intersection 37 (Monroe Street at Avenue 62) will have a traffic signal in the future, but the volumes shown on Figure 11 for Intersection 37 would not meet traffic signal warrants. The westbound right-turn volume should not be included as part of the westbound approach volume because of the recommendation for an exclusive westbound light-turn lane and the right-turn movement does not conflict with the large southbound left-turn movement.

Response G-17:

As noted above, the final design has a limited effect on capacity, especially in light of the overall future volumes. Hence, the change to a single combined left-through lane and a dedicated right turn lane was ultimately recommended for this intersection. Signalization will only occur when and if warranted. It should be noted that the Circulation Element provides the option of implementing a two lane roundabout at this intersection to meet buildout future needs.

Comment G-18:

The mitigation assumed for Intersection 37 was not appropriate to mitigate the impact at this intersection. Table 8 of the TIA shows Intersection 37 operating at LOS E during the evening peak hour. Footnote 3 states that signalization of the existing lanes was assumed for this intersection. This footnote is not correct because the text referencing Table 8 states that the analysis is based upon the future lane configurations shown in Figure 11 and the future approach lanes in Figure 11 are not the same as the existing approach lanes at Intersection 37. Traffic signals would not be installed because signal warrants are not met by these volumes.

Response G-18:

Comment noted. Please note that the Circulation Element provides the option of implementing a two lane roundabout at this intersection to meet buildout future needs. Signalization will only occur when and if warranted.

Comment G-19: *Jefferson Street*

The TIA did not provide any future traffic projections or level of service analysis for Jefferson Street between Avenue 58 and Avenue 62 (at Madison Street). In order to understand how the TIA addresses future development in the Travertine Specific Plan area, it is critical to at least provide year 2035 traffic volumes and identify the trip generation assumed for Section 5 and the surrounding development areas.

Response G-19: As noted above and as evident from Exhibit II-9 of the Draft General Plan and Exhibit II-17 of the Draft EIR, the cited segment of Jefferson Street

between Avenues 58 and 62 will largely serve adjoining land uses and is not a part of the larger regional circulation network. The cited segment of Jefferson Street primarily serves development in the vicinity of Lake Cahuilla, The Quarry and the Travertine and Green (Coral Canyon) Specific Plans.

Comment G-20: *Other Comments*

As discussed in Comment 13, the LQTAM appears to project approximately 9,000 daily trips on Avenue 62 generated by the future development of the Keck property (located south of Avenue 62 between the dike and Monroe Street). Based upon the LQTAM projections, future traffic will access the Keck property by crossing the dike and using Madison Street to travel to/from the north. If this is the case, the future traffic generated by the development of the Keck property would comprise a sizeable portion of the traffic utilizing the future Avenue 62 crossing of the dike as well as the future bridge needed to extend Madison Street from Avenue 60 to Avenue 62. Consequently, the developers of the Keck property would be responsible for paying their fair-share percentage of the construction of the dike crossing and the extension of Madison Street. It was our understanding that plans for the Keck property take access primarily from Monroe Street (south of Avenue 62). The last Keck property plans that we saw did not have an access designed to take advantage of future roadway improvements to Avenue 62 and Madison Street on the west side of the dike. If the Keck Property takes access primarily from Monroe Street and only takes emergency access to Avenue 62, the traffic assignment to Avenue 62 and Madison Street should be eliminated in the model. This may also reduce the problematic traffic volume on Madison Street, south of Avenue 54, but may increase the demand on Monroe Street, north of Avenue 62.

Response G-20:

The projected 9,600 average daily vehicles on this roadway segment include traffic originating from outside the General Plan planning area. It also conveys traffic destined for Travertine and future development on Keck property lands to the south. Other land uses to the north, including the Lake Cahuilla County and the future CVRP District regional parks, and access to the commercial districts of the City will also be facilitated by this segment and its eventual connection to Madison Street.

Regarding fair share distribution of costs and the Keck property located in the county and outside the La Quinta General Plan planning area, the County has designated the Keck property "Agriculture" (with a "Community Development" overlay, which would limit non-agricultural uses to very low density residential. At this time, there is very limited foreseeable development potential associated with the Keck property. Neither are there any specific development (or development access) plans beyond the current high-value agriculture occurring on this site.

Comment G-21:

The documentation provides no way to determine the trip generation assumed for the Travertine Specific Plan or the surrounding land uses located south of Avenue 58 and west of Monroe Street. Without this information, the Travertine development cannot verify that the modeled trip generation for this area is consistent with current development plans.

Response G-21:

Comment noted. It should be noted that the commentor has prepared several traffic analyses for the Travertine project and has incorporated analysis of surrounding lands in these studies. There have been numerous discussions regarding circulation within and in the vicinity of the Travertine project. The trip generation potential of the Travertine project, as well as the approved Coral Canyon TTM 33444 (Green Specific Plan), have been thoroughly analysed. Also, please see the TIA technical appendices, which have been provided to the commentor.

H. CITY OF INDIO

Comment H-1:

While the Draft EIR mentions that several roadways and intersections are shared with other jurisdictions and while the Draft EIR suggests that cooperation and communication with adjacent jurisdictions is needed, there has been no meaningful communication with our City Traffic Engineer (Mr. Tom Brohard) during the preparation of the Traffic Impact Analysis (other than an introductory call from Iteris indicating that their work on this project had begun). In fact, the list of organizations, persons, and documents consulted shown in Section IX of the Draft EIR does not list or identify any persons or documents from the City of Indio or any other municipality. Rather than preparing their Draft EIR in a vacuum, the City of La Quinta consultants for this project should have discussed various recommendations with the City of Indio and others, particularly those involving adding lanes within the City of Indio, to mitigate significant traffic impacts caused by intensified land use in the City of La Quinta and its sphere of influence.

Response H-1:

During the course of preparing the General Plan update and conducting associated traffic analysis, the City and project consultants conferred with and solicited input from the adjoining cities and the County of Riverside, as well as the Coachella Valley Association of Governments and the Southern California Association of Governments. These consultations included direct conversations with City Indio staff, including several discussions between the City Public Works Director and the Indio Traffic Engineer.

Comment H-2:

1) Existing Conditions - Regional Roadways - The discussion of State Highway 111 as a Regional Roadway beginning on Page 111-204 of the Draft EIR should be modified to indicate that the State relinquished this roadway several years ago to the local cities and the only portion of State Highway 111that remains in the Coachella Valley is in the City of Palm Springs. The Highway 111 discussion should also be moved into the discussion of Local Major Highways beginning on Page 111-205 of the Draft EIR.

Response H-2:

Comment noted. Changes are hereby incorporated by reference.

Comment H-3:

2) Roadway Segment Analysis for General Plan Buildout - Table 111-48 beginning on Page 111-221 of the Draft EIR contains some significant spikes in future traffic volumes from block to block. These increases do not appear to be reasonable as the adjacent properties are mostly developed at this time. The following Year 2035 ADT forecasts on roadways shared with the City of Indio require further validation:

- a. Jefferson Street from Avenue 48 to Avenue 50 In this segment, 2035 ADT volumes are 7,000 higher south of Avenue 48 and 18,000 higher north of Avenue 50 than the adjacent segments.
- b. Highway 111 from Dune Palms Road to Jefferson Street In this segment, 2035 ADT volumes are 10,000 higher east of Dune Palms Road than the adjacent segment to the west.
- c. Avenue 4 rom Dune Palms to Jefferson Street In this segment, 2035 ADT volumes are 16,000 higher east of Dune Palms Road than the segment to the west.
- d. Avenue 50 from Jefferson Street to Madison Street In this segment, 2035 ADT volumes are 14,000 higher east of Jefferson Street than the segment to the west.

Response H-3:

As noted in the Draft Circulation Element, Draft EIR and General Plan traffic study, existing and future traffic volumes on analyzed streets were modeled using a focused version of the regional RivTAM traffic model. Due to the development pattern in the area, most traffic generated travels on major roadways located along section lines. Specific to the four cited routes the following should help explain the modeled traffic volumes for buildout year 2035:

A. <u>Jefferson Street from Avenue 48 to Avenue 50</u>: The difference between volumes north and south of Avenue 48 result from the channeling of the difference east to Jefferson where sufficient roadway capacity will be available to accommodate the future north-south volumes.

- B. <u>Highway 111 from Dune Palms Road to Jefferson Street</u>: The volume differences cited in the comment that occur along Highway 111 in 2035 can be attributed to the remaining lands available for development along Highway 111 and east and west of Jefferson Street. The traffic model assigns traffic based on current and long-term movement patterns and also takes advantage of those roadways with available capacities. As a result, traffic on Dune Palms Road is projected to more than double in 2035 and to nearly double along Jefferson Street in 2035, for segments both north and south of Highway 111, thereby reducing volumes on the referenced segment of Highway 111.
- C. Avenue 48 from Dune Palms Road to Jefferson Street: The difference between volumes east and west of Dune Palm Road result from the channeling of future traffic east to Jefferson where sufficient roadway capacity will be available to accommodate the future north-south volumes. As can be seen from the model results, Washington Street is expected to operate at capacity, which will encourage future traffic to take advantage of Jefferson Street where additional capacity will be available.
- D. <u>Avenue 50 from Jefferson Street to Madison Street</u>: As with the above response to item C., above, the difference in volumes is attributable to the

model's channeling of future traffic to Jefferson Street and Madison Street where additional capacity will be available.

Comment H-4:

- 3) Intersection Impact Analysis- Table 111-49 beginning on Page 111-226 of the Draft EIR provides AM and PM Peak Intersection Analysis with 2035 buildout volumes during the peak season. The table should be expanded to indicate and more clearly disclose the additional lanes/traffic control measures that are required, particularly those additions in other jurisdictions including Indio. From Exhibit 111-21 to achieve LOS "D" or better, the following additional lanes are needed according to the Draft EIR at the intersections that are shared between La Quinta and Indio:
- a. Jefferson Street and Fred Waring Drive 50% Indio; 50% La Quinta Add westbound right turn lane in Indio.
- b. Jefferson Street and Highway 111 75% Indio; 25% La Quinta -Add 3rd southbound left turn lane and 4th southbound thru lane in La Quinta; add 4th northbound thru lane in Indio.
- c. Jefferson Street and Avenue 50.- 25% Indio; 75% La Quinta -Add 2nd eastbound left turn lane in La Quinta; add 2nd westbound left turn lane and 2nd westbound thru lane in Indio.
- d. Madison Street and Avenue 50 75% Indio; 25% La Quinta The proposed lane additions in the Draft EIR have been modified by the Indio/La Quinta Project Development Team (PDT) working together on the improvement of Madison Street to eliminate the possible need for a third northbound thru lane in Indio. The Draft EIR should be updated to reflect the ultimate intersection geometry approved by the PDT on July 24, 2012. These lane additions in the City of La Quinta now include a 2nd eastbound thru lane and an eastbound right turn lane. Lane additions in the City of Indio now include a 2nd southbound left turn lane, a second southbound thru lane, and a southbound right turn lane; a 2nd northbound left turn lane, and a northbound right turn lane; and a 2nd westbound thru lane and a westbound right turn lane. A traffic signal will also be installed at this intersection.
- e. Madison Street and Avenue 52 25% Indio; 75% La Quinta The proposed lane additions in the Draft EIR have been modified by the Indio/La Quinta PDT working together on the improvement of Madison Street to eliminate the possible need for a third northbound thru lane in Indio. The Draft EIR should be updated to reflect the ultimate intersection geometry approved by the PDT on July 24, 2012. These lane additions in the City of La Quinta now include two southbound left turn lanes, a second southbound thru lane, an a southbound right turn lane; a 2nd northbound left turn lane and a 2nd northbound thru lane. Lane additions in the City of Indio now include a 2nd westbound thru lane. A traffic signal will also be installed at this intersection.

f. Monroe Street and Avenue 52 - 50% Indio; 25% La Quinta; 25% County - Add 2nd eastbound thru lane in La Quinta; add 2nd southbound left turn lane, 2nd southbound thru lane and southbound right turn lane in Indio; add 2nd westbound thru lane in Indio; add two northbound left turn lanes, a 2nd northbound thru lane, and a northbound right turn lane in the County.

Response H-4:

Required intersection improvements for buildout year 2035 are set forth in detail for each of the 37 intersections analyzed starting on page II-88 of the Draft General Plan. They are also presented graphically in Exhibit II-11 of the Draft General Plan and in Exhibit III-21 of the Draft EIR. Those intersections shared with other jurisdictions, where there is some question of the feasibility of recommended improvements, are discussed in both the Draft General Plan and Draft EIR. Specific to the intersections raised in the City's comment letter:

A. <u>Jefferson Street and Fred Waring Drive</u>: Comment noted. A westbound right turn lane already exists at this intersection but will need to be shifted north to provide room for a third west bound through lane corresponding to the existing third westbound through lane on the west leg of the intersection. The above referenced figure shall be revised to reflect the need for the additional westbound through lane.

- B. <u>Jefferson Street and Highway 111</u>: Comment noted. The need for an additional southbound left turn lane, a fourth southbound through lane and a fourth northbound through lane are already properly noted ion the referenced exhibits. As discussed on page III-234 of the Draft EIR and as set forth in policies in the Draft Circulation Element, the City shall continue to coordinate with the City of Indio to implement Transportation Systems Management (TSM) and Transportation Demand management (TDM) programs to reduce traffic volumes at this intersection.
- C. <u>Jefferson Street and Avenue 50</u>: Comment noted. The need for a second eastbound left turn lane and a second westbound left turn lane are already properly noted on the referenced exhibits. The City of Indio already has paved improvements sufficient to provide the recommended combined second westbound through/right turn lane, and appears to have sufficient room for a dedicated westbound right turn and dedicated second westbound through lane when restriping for these becomes necessary.
- D. <u>Madison Street and Avenue 50</u>: The issue with this intersection is associated with clearing northbound traffic through the intersection. It does not require continuing three northbound lanes, the Draft General Plan and EIR showing adequate roadway capacity north of Avenue 50 with a four lane divided roadway. As noted in the City of Indio comment letter, the Indio/La Quinta Project Development Team comprised of city staffs

have worked to avoid the need for the referenced northbound through lane. The team reportedly agrees that a dedicated eastbound right turn lane should be planned, although the General Plan traffic analysis indicates that a combined through/right turn lane would suffice at this location. This change is hereby incorporated by reference in the EIR and will be incorporated in the final General Plan. Both the Draft General Plan and EIR recommend on-going monitoring of the performance of this intersection and the application of TSM and TDM programs that may assure that it continues to operate at an acceptable level of service in 2035.

- E. Madison Street and Avenue 52: The recommended intersection improvement set forth in the Draft General Plan and EIR are not consistent with those cited in the City of Indio's comment letter. Consistent with the City's comments, the Draft General Plan and EIR recommend the same improvements as those reportedly establish by the Indio/La Quinta Project Development Team comprised of city staffs. The one inconsistency is the recommendation for a second northbound left turn lane, which is not required by the General Plan traffic analysis but which would help transfer future northbound traffic to the west and reduce otherwise anticipated volumes on the northbound leg at the intersection of Madison Street and Avenue 50. This change is hereby incorporated by reference in the EIR and will be incorporated in the final General Plan.
- F. <u>Monroe Street and Avenue 50</u>: The intersection improvements cited in the City of Indio's comment letter are consistent with those set forth in the Draft La Quinta General Plan and EIR.

Comment H-5:

4) Intersections Potentially Worse Than LOS "D"- The underlying analysis in the Draft EIR is very conservative, having bumped up the October traffic counts by 10 percent to reflect higher volumes in January, February, and March. This baseline increase of 10 percent effectively translates to a drop in LOS from "D" to "E" at these intersections. Constructing costly additional improvements to maintain LOS "D" for the highest traffic volumes during three months of the year, when these intersections will operate at LOS "D" or better for the other nine months of the year, is not justified during these difficult economic conditions.

Since our Circulation Plan Update in 2008, the City of Indio allows LOS "E" under certain conditions (see attached). Many other jurisdictions in California also allow LOS "E" under these or similar conditions. For intersections shared with the City of Indio, especially those where Indio has jurisdiction over 75 percent of the intersection, the City of La Quinta should reconsider its LOS "D" standard and also allow LOS "E" under certain conditions. Mitigation measures necessary to achieve LOS "E" should be identified and more clearly disclosed in separate tables and figures, together with identification of improvements that are required

within the City of Indio. According to the Draft EIR, intersections shared between the Cities of La Quinta and Indio that may operate at worse than LOS "D" include:

a. Jefferson Street and Highway 111 - Only 25% of this intersection is in the City of La Quinta, with 75% of the intersection within the City of Indio. While adding a third SB left turn lane may be feasible, adding fourth northbound and southbound thru lanes on Jefferson Street will require additional right of way in the City of Indio. Both cities have constructed what are typically considered the maximum practical improvements at Jefferson Street and Highway 111 including dual left turn lanes, three thru lanes, and separate right turn lanes with green arrow overlaps on each approach. Further widening of the intersection which necessitates purchase of right of way and could result in other environmental impacts is not acceptable to the City of Indio. In accordance with the attached policy, LOS "E" conditions will therefore be acceptable if they should occur at buildout in Year 2035 during the peak season (January thru March) at Jefferson Street and Highway 111 in the City of Indio.

b.

c. Madison Street and Avenue 50 - Only 25% of this intersection is in the City of La Quinta, with 75% of the intersection within the City of Indio. The revised lane configurations approved by the Indio/La Quinta PDT will result in LOS "D" or better operating conditions in Year 2035. Further widening of the intersection which necessitates purchase of additional right of way and could result in other environmental impacts is not acceptable to the City of Indio. In accordance with the attached policy, LOS "E" conditions will therefore be acceptable if they should occur at buildout in Year 2035 during the peak season (January thru March) at Madison Street and Avenue 50 in the City of Indio.

Response H-5:

The use of a 10 percent weighting factor to arrive at peak season traffic volumes based on off-peak volumes is modestly conservative. Historically, growth in traffic volumes have increased beyond previously modeled predictions and therefore weighting peak season traffic seems a prudent approach since the acquisition of future rights of way will be precluded in most cases once development has occurred. Specific to two cited intersections projected to operate at worse than LOS D at 2035 buildout the following clarifications are provided:

A. <u>Jefferson Street and Highway 111</u>: Both the Draft La Quinta General Plan and EIR note that required improvements to maintain LOS D operating conditions at this interest in 2035 are probably not feasible and that other efforts should be applied, including TSM and TDM programs, to optimize long-term operating conditions. It should be noted that the City of La Quinta, recognizing constraints to further improvements at this

intersection, intends to adopt findings of overriding consideration for this and other intersections and roadways segments that are projected to operate at worse than LOS D conditions at the 2035 buildout period.

B. Madison Street and Avenue 50: As previously discussed above under Item D., the issue with this intersection is associated with clearing northbound traffic through the intersection. The Indio/La Quinta Project Development Team comprised of city staffs have worked to avoid the need for the referenced northbound through lane and this change is hereby incorporated by reference in the EIR and will be incorporated in the final General Plan. Both the Draft General Plan and EIR recommend on-going monitoring of the performance of this intersection and the application of TSM and TDM programs that should assure that it continues to operate at an acceptable level of service in 2035. It is recommended that the City of Indio also consider other strategies, including TSM and TDM programs to improve operating conditions at those intersections where Indio anticipated long-term LOS E operating conditions. It should also be noted that the City of La Quinta, recognizing constraints to further improvements at this intersection, intends to adopt findings of overriding consideration for this and other intersections and roadways segments that are projected to operate at worse than LOS D conditions at the 2035 buildout period.

Finally, it should also be noted that the City of Indio comment letter further argues that it finds that LOS D improvements are expensive, that LOS E operating conditions at many of its intersections is acceptable and that Indio has incorporated the LOS E standard into its 2008 Circulation Plan update. Inasmuch as the peak season population (residents and visitors) represent an important part of the local economy, and that both the Cities of Indio and La Quinta host and are beneficiaries of major peak season events, assuring acceptable levels of service during this period is a valuable investment.

I. COUNTY OF RIVERSIDE TRANSPORTATION AND LAND MANAGEMENT AGENCY

Comment I-1:

The Riverside County Transportation Department (RCTD) has reviewed the Circulation Element for the City of La Quinta General Plan. The County requests that any roadway designations within the City's Circulation Element that extend to the City/County boundary and the City's sphere of influence and that differ from the County's designations be coordinated with County staff. Specifically the RCT has compared the City's Circulation Element to the County's current Circulation Element and the Circulation Element the County will be proposing in its own update to the County General Plan. The RCTD is primarily concerned with potential conflicts regarding the proposed designations on Harrison Street (former SR-86) and Avenue 62 within the City's Circulation Element.

Based on discussions with City staff, the County understands that Harrison Street was modeled for the City's General Plan as an 8 lane divided facility and that the City's traffic model demonstrated the need for a facility of this size. The County concurs that an 8 lane facility will need to be accommodated in the future for Harrison Street. However, as of the writing of this letter the last published version of the City's General Plan showed Harrison Street as a Major Arterial Highway (6 lanes divided within 128 feet of right- of-way). The County requests the City incorporate a cross-section for an 8 lane divided highway into the City's General Plan and that the designation of Harrison Street would be changed to that cross-section. The County requests that the City's cross-section would generally conform to the attached cross-section.

Response I-1:

It is correct that General Plan buildout conditions for Harrison Street were modeled assuming an 8-lane divided roadway. The General Plan Circulation Element, including Exhibit II-2: General Plan Roadway Classifications, will be revised to reflect the 8-lane facility as an Augmented Urban Arterial as shown in the previous version of the General Plan. The City also agrees that the Augmented Urban Arterial to be incorporated in the updated General Plan Circulation Element will substantially conform to the improvement standards and overall right-of-way set forth in the County's Roadway Standard No. 87. Please note that lane widths vary somewhat from the County's standard; however, these should not significantly affect implementation of substantially consistent improvements.

Comment I-2:

The City is proposing that Avenue 62 be designated as a Secondary Arterial Highway (4 lanes undivided within 102 feet of right-of-way). The County has previously analyzed this roadway in the South Valley Parkway

Traffic Study and Roadway Phasing Plan dated April 4, 2007 prepared by Kimley-Horn and Associates, Inc. The conclusions of that study indicated that the portion of Avenue 62 that falls within the City's General Plan between Monroe Street and Harrison Street should be planned for four lanes within 220-feet of right-of-way. The County has done additional traffic modeling of this corridor in connection with a proposed update of the County's General Plan using the RIVTAM model. The assumptions of model for the proposed General Plan incorporated approved Specific Plans within this portion of the County, but otherwise did not use the proposed land use assumptions of the South Valley Parkway. The General Plan update model analyzed the full future build-out of all unincorporated and incorporated areas beyond the 2035 horizon, and the model has indicated that traffic volumes on Avenue 62 will warrant at least a 6 lane divided facility at full build-out. The County continues to recommend that Avenue 62 should be designated in such as way that sufficient right-ofway will be preserved for the accommodation of ultimate future growth and that at a minimum will permit the construction of a 6 lane divided facility. The County believes that a minimum of 152 feet of right-of -way should be preserved for this roadway, especially between Jackson Street and Harrison Street.

Response I-2:

Comment noted. As discussed with County Transportation Department staff during our August 21, 2012 teleconference, consultations between the City's traffic consultant and County Demographics staff indicated that the RivTAM model had utilized the unadopted land use designations set forth in the draft South Valley Parkway project. Regardless of whether these data were included in the modeling effort, County Transportation also indicates that RivTAM output is based upon buildout of all incorporated and unincorporated lands in the County, including those set forth in the currently proposed but not yet adopted Eastern Coachella Valley Area Plan.

The County's request that sufficient right-of-way be secured along Avenue 62 between Harrison Street and Monroe Street to allow for an ultimate 6-lane divided roadway is understandable. However, in previous discussions with the County, the City has expressed its concern regarding planning for such a large capacity roadway along Avenue 62 and was assured that a four-lane facility east of Harrison Street would be acceptable.

Nonetheless, the City has determined that between Harrison Street and Monroe Street, Avenue 62 can be designated as a Major Arterial (128 foot right-of-way), which is sufficient to construct a 6-lane divided roadway. The General Plan shall only require the construction of a 4-lane divided facility, reserving the unused right-of-way for additional lanes in the event these are needed in the future.

Comment I-3:

The County has adopted Community Design Guidelines for an area known as Vista Santa Rosa (VSR). The boundaries of this community include the unincorporated portions of the City of La Quinta's General Plan, covering the City's current sphere of influence and extend further to the south between Avenue 62 and Avenue 66 on the north and south and between Monroe Street and Harrison Street on the west and east. The County requests that the City would cooperate with the County in preserving the VSR community identity within its full boundaries. The County desires that this area remain intact through inclusion within the sphere of influence of one city and that future planning would consider all portions of this community.

Response I-3:

Comment noted. The City will continue to cooperate with the County in preserving the community of Vista Santa Rosa (VSR) within its full boundaries. As the County is aware, the Local Agency Formation Commission (LAFCO) sets the boundaries of a city's Sphere-of-Influence. Nonetheless, when considering future planning under the City of La Quinta's jurisdiction within the Vista Santa Rosa area, the City shall give thoughtful consideration to all portions of the VSR community.

J. COACHELLA VALLEY MOSQUITO AND VECTOR **CONTROL DISTRICT**

Comment J-1:

The District is a non-enterprise independent special district accountable to the citizens of the Coachella Valley, charged with the protection of public health through the control of vectors and vector-borne diseases within its boundaries. We operate under the California Health and Safety Code Division 3, Sections 2000-2910 (known as the Mosquito Abatement and Vector Control District Law). Our activities include the prevention and control of mosquitoes, filth flies, eye gnats, and the red imported fire ant.

Response J-1: Comment noted.

Comment J-2:

The General Plan Update may result in increases in these vector populations and impact the ability of the District to control vectors. Specifically, the expansion of La Quinta into its Sphere of Influence to the south and east will increase the likelihood that residents encounter vector and nuisance insects in agricultural and wetland habitats.

Response J-2: Comment noted.

Comment J-3: Mosquitoes

> Within the urbanized areas of La Quinta, as well as the rest of the Coachella Valley, mosquitoes breed in storm drain systems, neglected swimming pools, poorly designed or damaged landscape irrigation systems, and other containers that hold water for at least 96 hours. The most important vector species are the encephalitis mosquito and the southern house mosquito. These species can vector (transmit) West Nile virus, western equine encephalomyelitis and St. Louis encephalitis to humans. Additionally, West Nile virus and western encephalomyelitis can infect horses, which is of interest to La Quinta due to its numerous equestrian trails.

Response J-3: Comment noted.

Comment J-4:

The General Plan Update indicates that the number of dwelling units in the planning area will be increased to 53,103. The current number of dwelling units that are occupied year-round is 14,820 of the 23,489 available. If the current year-round occupation rate is kept constant at 63%, then 19,648 dwelling units could be expected to be unoccupied. If the current number of seasonal, recreational, and occasional use homes remains the same (27.5% according to the 2010 U.S. census), then 14,603 homes will be vacant for at least part of the year.

Response J-4: Comment noted. Comment J-5:

The District conducts aerial photography to determine if pools are neglected. In April 2012, we identified 245 pools in La Quinta as possibly being neglected, or approximately 1% of the dwelling units present. With an increase in dwelling units, we might expect this to reach 530 pools at build out. We currently see that approximately half of the pools on our possibly neglected list require treatment and follow-up inspections.

Response J-5:

Comment noted.

Comment J-6:

Storm drains, catch basins, dry wells, and detention basins are also commonly used as breeding sites for mosquitoes within the urban environment. Given that 2,084.5 acres of street rights of way are proposed to be built under the Preferred Plan, we expect that more storm drains will be built. We applaud La Quinta's commitment on page V-4 to be a Full Service Community. We agree that "storm drains ... [are] maintained in good working order and of adequate service level to address existing and future needs" is an important Guiding Principle and a task that ensures effective use of mosquito control products.

Response J-6:

Comment noted.

Comment J-7:

As the agricultural areas of the Sphere of Influence are built, residents are likely to encounter floodwater mosquitoes known as *Psorophora*. These mosquitoes are not vectors of disease; however, they are active day and night and are very painful biters. The addition of residents in the area will result in additional service requests, increasing our workload.

Response J-7:

Comment noted.

Comment J-8:

Filth flies and eye gnats

As the area within the La Quinta Sphere of Influence is developed from agricultural property into dwelling units, we expect to receive more requests for control of filth flies and eye gnats. Most flies lay eggs in decaying plant or animal matter as can be found in agricultural practices. We have seen the development of homes in traditionally agriculture areas result in unhappy homeowners who are not pleased with the presence of adult flies. We can and do recommend methods of preventing breeding sources of flies, but properties that are zoned for agriculture do have potential for fly breeding even when practicing standard and acceptable agricultural practices as defined by the California Health and Safety code.

Response J-8:

Comment noted.

Comment J-9: *Red imported fire ants (RIFA)*

While the red imported fire ant (RIFA) is not a vector of disease, it is an invasive species within the Coachella Valley that produces a very painful sting. People may experience localized pain or swelling and in some cases, anaphylactic shock. In urban areas, they build mounds close to buildings, in school yards, athletic fields, golf courses, and parks. In agricultural areas, they can build mounds near water sources and drip irrigation systems, feed on seeds and budding fruits, and sting livestock. La Quinta already has several golf courses that are infested with RIFA, and further creation of green spaces will likely result in the spread of the insect into the currently less urbanized Sphere of Influence.

Response J-9: Comment noted.

Comment J-10:

We applaud the City of La Quinta's commitment to using desert landscaping techniques as well as the development of educational programs and demonstration gardens to inform the public and businesses of water efficient techniques and sustainable practices. Reducing water use, particularly wasted water that flows into storm drains, will result in decreases in vector populations. We encourage the city to work with us and future developers to use vector prevention strategies when building storm drains and choosing landscape options.

Response J-10: Comment noted.

K. RIVERSIDE COUNTY PLANNING DEPARTMENT

Comment K-1:

The Vista Santa Rosa Design Guidelines were adopted by the Riverside County Board of Supervisors in January 2009, after completion of this collaborative effort and are available at the following link: http://www.rctlma.org/planning/content/devproc/guidelines/vistasantarosa/vistasantarosalogousageguides.pdf.

The County of Riverside requests that continued consideration of the comprehensive identity for the Vista Santa Rosa community, as referenced and detailed within the Design Guidelines, is incorporated into the City's updated General Plan and any other associated planning documents.

Response K-1:

Comment noted. As stated in the General Plan and the DEIR, a Master Plan is required for the City's eastern sphere of influence prior to annexation. The purpose of the Master Plan is, in part, to incorporate the character of the area in future development efforts. The City is familiar with the Design Guidelines, and the process that led to their completion, and will continue to include the Vista Santa Rosa community's vision in its planning efforts in the future.

L. HOFFMAN LAND DEVELOPMENT COMPANY

Note: The Hoffman Land Development Company comment letter was submitted with and is associated with a separate letter provided by Endo Engineering, whose comments are addressed separately in Comment Letter G, above.

Comment L-1:

We have made numerous requests to staff to work with us to review and analyze the modification and/or the possible deletion or conversion to emergency access of one or more of these roads as part of this General Plan Update. Staff has advised that such review and analysis is not timely and should be undertaken later as part of a Specific Plan review of the Travertine property. We have respected this requested, as it has been our understanding that the City intends to review and apply the circulation element flexibly in this area of the City understanding that among other things, it is not in the public interest to construct roads that are unnecessary or oversized. The Endo Engineering analysis of the report reveals that this southerly area of the City was not extensively studied and much detailed information is lacking when compared to the analysis performed in other areas.

For the above reasons we request that a written statement be included in the policy document confirming that circulation will be flexibly interpreted in the Southerly Jefferson/Avenue 58/Madison/Avenue 62 area and further that an acknowledgement of this be included in the EIR Circulation analysis.

Response L-1:

Comment noted. The City has been working with the Travertine project proponent and will continue to cooperate in the proponents planned project revisions. Until such time as the City approves new land uses on the Travertine site, current entitlements must be used to model area traffic. As the City has consistently indicated, it will consider a revision to the City Circulation Element and Roadway Classifications concurrent with the submittal of a complete amendment to the approved Travertine Specific Plan.

Again, it is noted that the commentor's traffic engineer (Endo Engineering) has prepared several traffic analyses for the Travertine project and has incorporated analysis of surrounding lands in these studies. These data have been shared with the General Plan traffic consultant. There have been numerous discussions regarding circulation, and multiple land use scenarios were modeled for this area, including the vicinity of the Travertine project. The trip generation potential of the Travertine project, as well as the approved Coral Canyon TTM 33444 (Green Specific Plan), have been thoroughly analyzed as well. Also, please see the TIA technical appendices, which have been provided to the commentor.

Also note that the Policies in the Draft General Plan Circulation Element provide the City with flexibility in responding to changing conditions and the need for or appropriateness of adjusting rights of way and improvements to meet long-term capacity needs along segments and at City intersections.

M. AGUA CALIENTE BAND OF CAHUILLA INDIANS

Note: This letter was mailed to the City on September 6th, one week after the close of the comment period. Although the City is not obligated to respond under CEQA, it has been included in this response to comments.

Comment M-1:

According to our records on Cahuilla landscapes, there are traditional cultural properties exist within the General Plan area that have not been documented Dr. Lowell Bean's book *The Cahuilla Landscape (1991)* and Frank Patencio's book, *Stories and Legends of the Palm Springs Indians (1943)* describe two Cahuilla place name locations. *Cow on vah al ham ah* is a settlement area for the Cahuilla located east of Happy Point. The area is associated with the Cahuilla culture hero *Eagle Flower* who made impressions into the surrounding landscape. Another Cahuilla place name location is located near the historic La Quinta Hotel on Eisenhower. Oral traditions suggest *Eagle Flower* resided in a village known as *Kotevewit* along the foothills. Archaeological sites and cultural resources mentioned in the DEIR may be associated with these important Cahuilla place names locations.

Response M-1: Comment noted.

Comment M-2:

We request a thorough background research in traditional Cahuilla landscapes and oral history to better understand the cultural significance and potential impacts to the Cahuilla traditional places. This research shall be added to the historic and prehistoric sections of the plan under Cultural Resources

Response M-2:

The General Plan is a policy document, and as such provides a broad overview of the importance of cultural resources, including Native American resources, in the community. It is not appropriate for the General Plan to include a comprehensive inventory of cultural landscapes and oral history. Because of the rich cultural history in the City, the City requires the preparation of cultural resource reports for individual development projects, and has specific standards for the research for and preparation of these reports. These standards include Native American consultation. This is the appropriate time for any Tribal official to provide comments and concerns on any resource issue, including cultural landscapes and oral history.

In the case of the preparation of the General Plan, the commentor was contacted in writing by the archaeologist preparing the General Plan Cultural Resources study in April 2010. No response was received.

Comment M-3: Under Section 111-66 3.1 Mitigation Measures regarding consultations

with tribes, we would like to emphasize the need for consultation on every

project

Response M-3: Comment noted. The City does include the Tribe in all project

consultations. In addition, the Tribe is included in the Native American

Heritage Commission listings for all projects.

Comment M-4: Section 111-66 3.2 Mitigation Measures, we request the following be

added: 100% survey and cultural resource inventory is required prior to

the approval of projects

Response M-4: Comment noted. The stated mitigation measure #2 on page III-66 requires

surveys for cultural resources on vacant sites prior to project approval as

written. No change is necessary.

Comment M-5: Section 111-66 3.2 Mitigation Measures, we request copies of any

associated cultural resource reports and site records that might be

generated in connection with these efforts for review and comment

Response M-5: Comment noted. The Tribe has the opportunity to request copies of

cultural resource reports when CEQA documentation is transmitted to the

Tribe for comment.

Comment M-6: Section 111-66 3.2 Mitigation Measures, we request a review period of 45

days to review the associated cultural resource reports and site records and will provide additional comments, such as proposed mitigation measures

or conditions of approval, at that time.

Response M-6: Comment noted. There is no statutory requirement for a 45 day review

period for cultural resource studies. The Tribe has the opportunity to comment on all CEQA documents as provided in Public Resources Code

21091.

Comment M-7: Page III 67 Section A. Mitigation Monitoring and reporting we request an

Approved Cultural Resource Monitor(s) must be present during any ground disturbing activities by developers. Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified (Secretary of the Interior's Standards and Guidelines) Archaeologist to investigate and, if necessary, prepare a mitigation plan for submission to the Agua Caliente Tribal Historic Preservation Officer. Work on the overall project may continue

during this assessment period.

Response M-7: The City requires that qualified monitors be present during all earth

moving activities on any property on which the potential for cultural

resources is identified. The monitors are empowered to stop or redirect construction activities. This requirement has been and will continue to be a standard condition of the Historic Preservation Commission, and a standard mitigation measure in the Planning Department's CEQA documents.

Comment M-8:

We request specification (sic) if human remains are encountered during grading and other construction excavation, work in the immediate vicinity shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5.

Response M-8:

The commentor's request is a requirement of California law with which the City complies. No change is required in the EIR.







STATE OF CALIFORNIA GOVERNOR'S OFFICE of PLANNING AND RESEARCH STATE CLEARINGHOUSE AND PLANNING UNIT



A-1

August 28, 2012

Andrew Mogenson City of La Quinta P.O. Box 1504 La Quinta, CA 92253

Subject: General Plan Update

SCH#: 2010111094

Dear Andrew Mogensen:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 27, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Director, State Clearinghouse

Enclosures

P,002

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

> SIVIE CLEARINGHOUSE AUG-30-2012

Document Details Report State Clearinghouse Data Base

SCH# 2010111094

Project Title General Plan Update Lead Agency La Quinta, City of

> Draft EIR Турв EIR

Update of the La Quinta General Plan, to encompass all mandated Elements, and add a Sustainable Description

Community and an Economic Development Element. The Update will include modifications to the Land Use Map, but will not significantly change land use patterns in the City. The Update also includes planning and land use designations for the City's Sphere of Influence. A Greenhouse Gas

Fax

Reduction Plan is also being proposed, in conjunction with the General Plan.

Lead Agency Contact

Name Andrew Mogensen City of La Quinta Agency

Рһопе (760) 777-7125

email

P.O. Box 1504 Address

State CA Zip 92253 City La Quinta

Project Location

Riverside County City La Quinta

Region

33° 6,6' 3" N / 116° 31' 0" W Lat / Long

Cross Streets City-wide

Parcel No.

Section Base Township Range

Proximity to:

Highways Hwy 111

Jacqueline Cochran **Airports**

Rallways

Waterways Coachella Valley Stormwater Channel

Schools

Land Use

Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Project issues

Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxio/Hazardous; Traffic/Circulation; Vegetation; Water

Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse

Reviewing **Agencies**

Resources Agency; Department of Fish and Game, Region 6; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency

Management Agency, California; California Highway Patrol; Caltrans, District 8; Department of Housing

and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 7; Native American Heritage Commission; Public Utilities Commission;

Coachella Valley Mountains Conservancy

Date Received 07/12/2012

Start of Review 07/12/2012

End of Review 08/27/2012

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE CLEARINGHOUSE AUG-30-2012 15:21 P'003

STATE OF CALIFORNIA

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 853-6251 Fax (918) 857-5390 Wob Sto www.nahc.ca.gov ds_nahc@pacbell.net 8/27/12



July 17, 2012

Mr. Andrew Mogensen, AICP, City Planner

City of La Quinta

P.O. Box 1504 La Quinta, CA 92253



Re: SCH#2010111094; CEQA Notice of Completion: draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update; located in the City of La Quinta; Coachella Valley; Riverside County, California.

Dear Mr. Mogensen:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352/3, et seq.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including …objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you

make contact with the list of Native American Contacts on the attached <u>list of Native American contacts</u>, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and should be conducted in compliance with the requirements of federal NEPA and Section 106 and should be conducted in Compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq.), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seq. and NAGPRA (26 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely.

Tale Singleton Program Analyst

Cc. State Clearinghouse

Attachment: Native American Contact List

* * * * *	F(OR:		TRANSACTION REPORT			AUG-30-2012 THU		_	* * * *
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NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-6251 Fax (916) 657-5390 Web Site <u>www.nahc.ca.gov</u> ds nahc@pacbell.net



July 17, 2012

Mr. Andrew Mogensen, AICP, City Planner

City of La Quinta

P.O. Box 1504 La Quinta, CA 92253



Re: SCH#2010111094; CEQA Notice of Completion: draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update; located in the City of La Quinta; Coachella Valley; Riverside County, California.

Dear Mr. Mogensen:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352/3, et seq.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

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Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you

B-1

B-2

B-3

B-4

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B-4

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B5

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B-6

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

B-7

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

B-8

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

B-9

If you have any questions about this response to your request, please do not hesitate to contact me at (916) §53-6251,

Since/ely,

Dave Singleton Program Analyst

Cc:

State Clearinghouse

Attachment: Native American Contact List

Native American Contact

Riverside County July 17, 2012

Cabazon Band of Mission Indians David Roosevelt, Chairperson 84-245 Indio Springs Cahuilla

Indio

, CA 92203-3499

(760) 342-2593 (760) 347-7880 Fax

Los Covotes Band of Mission Indians Shane Chapparosa, Chairman

P.O. Box 189

Cahuilla

Warner

, CA 92086

(760) 782-0711

(760) 782-2701 - FAX

Ramona Band of Cahuilla Mission Indians Joseph Hamilton, Chairman

P.O. Box 391670

Cahuilla

Anza

, CA 92539

admin@ramonatribe.com

(951) 763-4105

(951) 763-4325 Fax

Torres-Martinez Desert Cahuilla Indians Mary Resvaloso, Chairperson

PO Box 1160

Cahuilla

Thermal

, CA 92274

mresvaloso@torresmartinez.

(760) 397-0300

(760) 397-8146 Fax

Santa Rosa Band of Mission Indians John Marcus, Chairman P.O. Box 391820 Cahuilla

Anza

, CA 92539

(951) 659-2700

(951) 659-2228 Fax

Augustine Band of Cahuilla Mission Indians Mary Ann Green, Chairperson

P.O. Box 849

Cahuilla

Coachella

, CA 92236

(760) 398-4722

760-369-7161 - FAX

Morongo Band of Mission Indians Michael Contreras, Cultural Heritage Prog.

12700 Pumarra Road

Cahuilla

Banning

, CA 92220

Serrano

(951) 201-1866 - cell

mcontreras@morongo-nsn.

gov

(951) 922-0105 Fax

Torres-Martinez Desert Cahuilla Indians

Diana L. Chihuahua, Vice Chairperson, Cultural

P.O. Boxt 1160

Cahuilla

Thermal

, CA 92274

760) 397-0300. Ext. 1209

(760) 272-9039 - cell (Lisa)

(760) 397-8146 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010111094; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update; City of La Quinta; Riverside County, California.

Native American Contact Riverside County July 17, 2012

Agua Caliente Band of Cahuilla Indians THPO Patricia Tuck, Tribal Historic Perservation Officer 5401 Dinah Shore Drive Cahuilla Palm Springs, CA 92264 ptuck@augacaliente-nsn.gov (760) 699-6907

(760) 699-6924- Fax

Augustine Band of Cahuilla Mission Indians Karen Kupcha P.O. Box 849 Cahuilla Coachella CA 92236 (760) 398-4722 916-369-7161 - FAX

Cahuilla Band of Indians
Chairperson
PO Box 391760 Cahuilla
Anza , CA 92539
tribalcouncil@cahuilla.net
915-763-5549

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010111094; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update; City of La Quinta; Riverside County, California.

Riverside County Airport Land Use Commission RCALUC

AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY



CHAIR

August 15, 2012

Simon Housman Rancho Mirage

VICE CHAIRMAN

Mr. Andrew Mogensen, Principal Planner City of La Quinta Planning Department P. O. Box 1504

Rod Ballance P.

78-495 Calle Tampico

COMMISSIONERS La Quinta CA 92253

Arthur Butler

RE: Draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update (SCH # 2010111094)

Robin Lowe Hemet

Riverside

Dear Mr. Mogensen:

John Lyon Riverside Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a CD copy of the Draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update. We have reviewed the document and offer the following comments.

On page III-99 of the Draft EIR, Bermuda Dunes Airport is variously referred to as a "private

Glen Holmes Hemet

Greg Pettis Cathedral City

STAFF

Director Ed Cooper

John Guerin Russell Brady Barbara Santos

County Administrative Center 4080 Lemon St.,14th Floor. Riverside, CA 92501 (951) 955-5132

airfield" or a "private airstrip." This is an incorrect classification. Bermuda Dunes Airport should be described as a "privately-owned public use airport." As a public use airport, Bermuda Dunes Airport is subject to permitting requirements of the State of California Department of Transportation Division of Aeronautics. Another distinction between a public use airport and a private airstrip is that Airport Land Use Commissions are required to prepare Airport Land Use Compatibility Plans for the environs of public use airports. A handwritten annotated copy of page III-99 is attached hereto, and we would recommend that the Final EIR incorporate the recommended changes.

A portion of the City of La Quinta located northerly of Fred Waring Drive and westerly of Jefferson Street is within Compatibility Zone D and is proposed for a land use designation of Low Density Residential (0 to 4 dwelling units per acre). This land use designation is not consistent with Countywide compatibility criteria for Compatibility Zone D; however, as this designation reflects an existing land use (a recorded tract map), a finding of consistency could still be made by the Airport Land Use Commission.

www.rcaluc.org

The current boundaries of the City of La Quinta lie outside the Airport Influence Area for Jacqueline Cochran Regional Airport, but the sphere of influence extends into this area and is included primarily in Compatibility Zones D and E. Small portions of Compatibility Zones C and B1 extend into the area directly southwesterly of the Airport Boulevard/Harrison Street intersection. This area is within the community of Vista Santa Rosa, where the Commission has indicated a willingness to consider special policies if large expanses of open area can be preserved in perpetuity. (Please see the attached letter from the Airport Land Use Commission to the Riverside County Planning Department regarding this issue.)

Pursuant to Section 21676(b) of the California Public Utilities Code, "prior to the amendment of a general plan...the local agency shall first refer the proposed action to [ALUC]." At the appropriate time prior to action (ideally before Planning Commission consideration, but definitely before City Council action), the new General Plan should be submitted to the Airport Land Use Commission for a consistency review. (A copy of the "Application for Major Land Use Action

C-1

C-2

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C-3

C-4

Review" form is attached, for your convenience.)

C-4

We urge your consideration of the Countywide Policies of the 2004 Riverside County Airport Land Use Compatibility Plan, the 2004 Bermuda Dunes Airport Land Use Compatibility Plan, and the 2005 Jacqueline Cochran Regional Airport Land Use Compatibility Plan in proposing land use designations for properties within the Airport Influence Areas of these two airports. Additionally, the California Airport Land Use Planning Handbook published by the State of California Department of Transportation, Division of Aeronautics, is an excellent resource that should be consulted in your efforts to provide for a General Plan that furthers the objectives of airport land use compatibility planning. We recommend that the chapter addressing "Responsibilities of Local Agencies" be reviewed.

C-5

In situations where a jurisdiction's General Plan has not been determined by ALUC to be consistent with applicable Airport Land Use Compatibility Plans, ALUC is empowered to require submittal of all actions, regulations, and permits (such as land divisions and development of structures with a cumulative floor area of 20,000 square feet or greater) involving land within an Airport Influence Area for individual determinations of consistency or inconsistency. All major land use actions, with or without legislative actions such as general plan amendments, specific plans and specific plan amendments, and zoning changes, affecting land within the Airport Influence Areas of Bermuda Dunes Airport and Jacqueline Cochran Regional Airport are presently subject to ALUC review. ALUC reviews for conformance with ALUCP compatibility criteria, including land use intensity, noise, and height. (Once ALUC has determined a jurisdiction's General Plan to be consistent, only those projects involving general plan amendments, specific plans, specific plan amendments, ordinance amendments, or zoning changes are subject to ALUC review.)

C-6

The protection of airports from incompatible land use encroachments is vital to California's economic future. ALUCs were created by the State of California to work with local jurisdictions in a joint effort to provide for compatible land uses in the vicinity of public use airports. ALUC staff is available to assist the City in this effort in order to provide for a General Plan that is consistent with adopted Compatibility Plans, and would be happy to meet with you and City staff to discuss the General Plan and the ALUC review process at your convenience.

C-7

If you have any questions, please contact John Guerin, ALUC Principal Planner, at (951) 955-0982.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Edward C. Cooper, Director

Attachments (3):

Page III-99 with recommended corrections

Letter to Riverside County Planning re: Vista Santa Rosa

Application for Major Land Use Action Review

CC:

Nicole S. Criste, Terra Nova Planning & Research Mike Smith, Bermuda Dunes Executive Airport

Daryl Shippy, Riverside County EDA – Aviation (Indio)

and Navy uses. 43 No new development throughout the Planning Area will be located on hazardous materials sites pursuant to Government Code Section 65962.5. As such, there will be no impact related to new populations being located on hazardous materials sites.

Airports and Associated Hazards Impacts

A portion of the Planning Area is located in Zone C, with a very small area in Zone B1.

The Jacqueline Cochran Regional Airport is immediately adjacent to the eastern boundary of the Sphere of Influence. As a result, aircraft using the airport may fly over the Planning Area.

The Gounty of Riverside has prepared the Riverside County Airport Land Use Compatibility Plan, which provides policies for Airport Influence Areas for all airports in the County. Eastern portions of the La Quinta Planning Area are located within the Jacqueline Cochran Airport Influence Area Zone D and E of the Compatibility Plan. New development within the eastern boundary of the Sphere of Influence will need to abide by Compatibility Plan polices and land use regulations. Land uses such as schools, hospitals, and nursing homes are discouraged in Airport Compatibility Land Use Zone D, and the number of residential dwelling units is regulated in this zone. Within Zone E, there are no residential or commercial restrictions, however, prohibited uses include those that create hazards to flights, including tall objects, visual and electronic forms of interference, and developments that attract birds, such as landfills.⁴⁴

The General Plan Update proposes non-residential land uses, including both industrial and commercial uses, within Zone D, and residential uses are proposed in Zone E. These uses are allowed according to the Compatibility Plan. Therefore, hazards related to the Jacqueline Cochran Regional Airport will have a less than significant effect on development within the Planning Area.

The General Plan Update Planning Area is also near the Bermuda Dunes airstrip. This private airfield is located approximately 1.5 miles northeast of the northern Sphere of Influence and City limit, along Interstate 10 west of Jefferson Street. The 5,000-foot runway is oriented in an eastwest direction, and approaches and takeoff patterns generally do not affect any portion of the Planning Area. 45 According to the Riverside County Airport Land Use Compatibility Plan, the far northern portions of La Quinta, including the northern Sphere of Influence, are located in Compatibility Land Use Zone E. As previously mentioned, there are no residential for commercial restrictions in Zone E; however, prohibited uses include those that create hazards to flights, including tall objects, visual and electronic forms of interference, and developments that attract birds, such as landfills. 46 Proposed land uses within Zone E are compatible with the Bermuda Dunes Compatibility Plan. Therefore, implementation of the General Plan Update will have a less than significant impact within the vicinity of a private airstrip. primarily this public use airport.

[&]quot;Hazardous Waste and Substances Site List", www.envirostor.dtsc.ca.gov, accessed January 14, 2011.

^{44 &}quot;Riverside County Airport Land Use Compatibility Plan; Volume I", prepared by Mead & Hunt, October 14,

⁴⁵ Bermuda Dunes Airport, http://bermudadunesairport.com/, accessed December 17, 2010.

⁴⁶ "Riverside County Airport Land Use Compatibility Plan; Volume I", prepared by Mead & Hunt, October 14, area has already been developed with housing.)



AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

CHAIR A

Simon Housman Rancho Mirage

VICE CHAIRMAN Rod Ballance Riverside

COMMISSIONERS

Arthur Butler Riverside

> Robin Lowe Hemet

John Lyon Riverside

Glen Holmes Hemet

Melanie Fesmire Indio

STAFF

Director Ed Cooper

John Guerin Brenda Ramirez Sophia Nolasco Barbara Santos

County Administrative Center 4080 Lemon St., 9th Floor. Riverside, CA 92501 (951) 955-5132

www.rcaluc.org

April 14, 2008

Mr. Jerry Jolliffe, Deputy Planning Director County of Riverside Planning Department 4080 Lemon Street, 9th Floor

Riverside CA 92501 HAND DELIVERY

Dear Mr. Jolliffe:

RE: AIRPORT LAND USE COMMISSION (ALUC) DEVELOPMENT REVIEW

File No.: Not Applicable

Related File No.: Vista Santa Rosa Concept Plan

On April 10, 2008, the Vista Santa Rosa Concept Plan was brought before the Riverside County Airport Land Use Commission (ALUC) on an informal (non-vote) basis. As proposed on that date, the Commission expressed its <u>conceptual support</u> for the Plan, provided that the following amendments are made so as to allow the Plan to be eligible for a finding of consistency with the 2005 Jacqueline Cochran Regional Airport Land Use Compatibility Plan, pursuant to Section 3.3.6 of the Countywide Policies of the 2004 Riverside County Airport Land Use Compatibility

Plan:

RECOMMENDED AMENDMENTS:

The Airport Land Use Commission recommends that the County of Riverside incorporate the amendments specified herein (or substantively similar text as acceptable to the ALUC Director) into the Vista Santa Rosa Concept Plan and submit the revised text to ALUC staff for concurrence prior to final adoption by the County.

- 1. The Concept Plan shall be amended to add the boundaries of Airport Zones B1, C, D, and E.
- 2. Table 2A of the Countywide Policies of the Riverside County Airport Land Use Compatibility Plan shall be incorporated into the Vista Santa Rosa Concept Plan as an Appendix.
- 3. A statement shall be added in the discussion of Policy Area 1 stating that residential densities in the portion of Planning Area 1 in Airport Zone D shall be not less than five dwelling units per acre.
- 4. Policy Areas 3 and 4 shall include policies that require new residential units (other than individual dwelling units on existing legal lots and second units) in Airport Zone D to either comply with the density criteria of Table 2A (which allows clustered development

Airport Land Use Commission Page 2

envelopes of five or more dwelling units per acre, but otherwise restricts density to a maximum of one dwelling unit per five acres, in accordance with Option A below), or with the specifications of Option B or Option C, as stated below.

- 5. The Plan shall include a statement that all legislative actions in the Airport Influence Area shall be submitted to the Airport Land Use Commission for mandatory review and that all major land use actions as defined in the Riverside County Airport Land Use Compatibility Plan within that area shall be submitted to the Airport Land Use Commission for advisory review.
- 6. The Plan shall include a statement that all projects ten acres or larger within Airport Zone D shall set aside ten percent of land area in qualified open areas not less than 300 feet in length and 75 feet in width and free from obstructions, unless the project is located in a development area within which a 50-acre contiguous open space area has been established or is being concurrently established. The qualified open areas may include pastures, polo and soccer fields, golf course fairways, drainage easements, and roadways. Trees, light poles exceeding four feet in height, and trash enclosures are not permitted in such open areas.
- 7. At the time of the adoption of the Vista Santa Rosa Concept Plan or sooner, the County must agree to amend the Eastern Coachella Valley Area Plan to incorporate current compatibility criteria for Jacqueline Cochran Regional Airport in its Policy Areas text and tables.
- 8. The discussion of Lifestyle Corridors should include a statement that schools, lakes, streams, and water features (other than existing water features) will not be located in the portion of the east-west corridor located in Airport Zone D, and that commercial and public-use structures and uses therein would be required to comply with person intensity limits.
- 9. A statement shall be added in the discussion of Other Land Use Types stating that, if the property at the northwest corner of 60th Avenue and Harrison Street is developed pursuant to the Community Center Overlay, residential densities in that area shall not be less than five dwelling units per acre.
- 10. The section addressing "Compatibility with Jacqueline Cochran Regional Airport" shall be rewritten to delete the reference to "the portions of the parcels proposed for designation as High Density Residential along Harrison Street," since the Plan no longer proposes any residential designations for land in Airport Zones B1 and C. The reference to "the portion of the parcel proposed as Commercial Tourist that is located at the southwest corner of Harrison Street and Airport Boulevard" should be replaced with a reference to "Commercial Tourist and Business Park uses," and should simply state that the intensity of uses shall comply with the person intensity limits of the applicable Airport Zone, as specified in Table 2A.
- 11. Section D should include a separate paragraph describing "qualified open areas in Airport Zones," as defined in the Airport Land Use Compatibility Plan.

Airport Land Use Commission Page 3

The designations of the portions of Policy Areas 3 and 4 within Airport Zone D for residential development at densities of 0.5 to 3.0 dwelling units per acre is inconsistent with the 2005 Jacqueline Cochran Regional Airport Land Use Compatibility Plan, in that Airport Zone D prohibits intermediate residential densities greater than 0.2 dwelling units per acre and less than 5.0 dwelling units per net acre, unless special findings are made pursuant to Section 3.3.6 of the 2004 Riverside County Airport Land Use Compatibility Plan. However, the community's overall vision of open space, agriculture, and roadways with wide setbacks to preserve vistas is compatible with appropriate design for residential communities in the vicinity of airports.

There are several factors that are unique to the Vista Santa Rosa community as it relates to the Jacqueline Cochran Regional Airport:

- a. The Vista Santa Rosa Concept Plan is built around the concept of "open spaceoriented community amenities" and requires minimum proportions of project average that must be allocated to such amenities in order for a project with a density greater than one dwelling unit per acre to be approved.
- b. The Plan was initiated in response to citizen action by residents of Vista Santa Rosa interested in maintaining the rural atmosphere of the community.
- c. The entire Vista Santa Rosa area lies outside the 55 dB(A) CNEL contour on maps depicting noise contours based on the ultimate activity levels for Jacqueline Cochran Regional Airport.
- d. The inclusion of Vista Santa Rosa in Airport Zone D (with the exception of the easterly 500 feet) is attributable to Runway 12-30. The standard lateral distance from Runway 17-35 used in demarcating Zones D and E at this airport is 8,000 feet, and only the easterly 500 feet is located within this 8,000-foot lateral distance.
- e. According to the Airport Activity Data Summary of the adopted Airport Land Use Compatibility Plan, Runway 12-30 is expected to account for not more than 10% of annual activity by single engine and twin-engine piston aircraft and not more than 4% of annual activity by twin-engine turboprop aircraft, helicopters, and small business jets.
- f. The maximum pavement strength of Runway 12-30 is 20,000 pounds, compared with a maximum pavement strength of 174,000 pounds for Runway 17-35. Therefore, it is unlikely that Runway 12-30 would be utilized for air cargo service in the future.
- g. The Concept Plan offers an opportunity for the community to be designed in a manner that improves safety in the long term by assuring that, as the community transitions from agricultural to suburban estate residential uses, provision will be made for either a larger proportion of land area available for emergency landing or one large emergency landing area that would be clearly visible to aircraft pilots.

Airport Land Use Commission Page 4

In light of all of these factors, the Airport Land Use Commission agreed that there is reasonable justification for consideration of special criteria to be applied when evaluating the proposed intermediate densities within the Vista Santa Rosa community. These special criteria would allow for development at an overall density of 0.2 to 2.5 dwelling units per acre provided that an avigation easement is conveyed to the County Economic Development Agency as owner-operator of Jacqueline Cochran Regional Airport and that a substantially larger proportion or area of open space is provided.

The alternatives for residential development in the Airport Zone D area are as follows:

OPTION A

Development at a density of one dwelling unit per five acres, development at an overall density of five or more dwelling units per acre within residential areas, or development within clustered pods of five or more dwelling units per acre (net density of residential planning areas including roads less than 74 feet in width). Such development is subject to recordation of a deed notice and, if the project is 10 acres or larger in area, the required 10% of project acreage in qualified ALUC open area. (Option A is consistent with Table 2A density criteria.)

OPTION B

Development at an overall density of 0.2 to 1.5 dwelling units per acre may be found consistent pursuant to Section 3.3.6, provided that an avigation easement is recorded and that not less than 15% of project acreage is dedicated to qualified open areas not less than 75 feet in width and not less than 600 feet in length.

Development at an overall density of 1.5 to 2.5 dwelling units per acre may be found consistent pursuant to Section 3.3.6, provided that an avigation easement is recorded and that not less than 20% of project acreage is dedicated to qualified open areas not less than 75 feet in width and not less than 600 feet in length.

OPTION C

Development at an overall density of 0.2 to 2.5 dwelling units per acre may be found consistent pursuant to Section 3.3.6, provided that an avigation easement is recorded. In lieu of dedicating the percentages of open areas specified in OPTION B above, the development may choose to set aside an area of 50 contiguous acres of qualified open area with no linear dimension less than 600 feet, with such qualified open area to be dedicated as open area in perpetuity. Once such an area is set aside for this purpose, this area will meet the open area requirement for up to 450 acres of development area (excluding that open area) within the portion of Airport Zone D located northerly of 60th Avenue.

If you have any questions, please contact John Guerin, Airport Land Use Commission Principal Planner, at (951) 955-0982.

Airport Land Use Commission Page 5

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Edward C. Cooper, Director

JGG:bks

cc:

ALUC Staff

Michael Gialdini, Office of Fourth District Supervisor Roy Wilson

Y:\ALUC\JCRA\VistaSantaRosaCommentsALUCApr08.doc

APPLICATION FOR MAJOR LAND USE ACTION REVIEW

ALUC Identification No.

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

PROJECT PROPONE	ENT (TO BE COMPLETED BY APPLICANT)		
Date of Application Property Owner		Phone Numb	er
Mailing Address			
Agent (if any)	<u> </u>	Phone Numb	er
Mailing Address			
	N (TO BE COMPLETED BY APPLICANT) and map showing the relationship of the project site to the airport boundary and runways		
Street Address			
		70	
Assessor's Parcel No.		Parcel Size	
Subdivision Name		Zoning	
Lot Number		Classification	<u> </u>
If applicable, attach a deta	TION (TO BE COMPLETED BY APPLICANT) illed site plan showing ground elevations, the location of structures, open spaces and w description data as needed	ater bodies, and	the heights of structures and trees;
Existing Land Use			
(describe)			
	2		
Proposed Land Use			
(describe)			
	VIII II 		
For Residential Uses	Number of Parcels or Units on Site (exclude secondary units)		=======================================
For Other Land Uses			
(See Appendix C)	•		
	Method of Calculation		
Height Data	Height above Ground or Tallest Object (including antennas and trees)		ft.
	Highest Elevation (above sea level) of Any Object or Terrain on Site		ft.
Flight Hazards	Does the project involve any characteristics which could create electrical integration confusing lights, glare, smoke, or other electrical or visual hazards to aircra	terference, ft flight?	☐ Yes
			□ No
	If yes, describe		
	·		

REFERRING AGENCY (TO BE COMPLETED BY AGENCY STAFF)							
Date Received	te Received Type of Project						
Agency Name	,						General Plan Amendment
, .go,							Zoning Amendment or Variance
Staff Contact	,						Subdivision Approval
Phone Number						 	Use Permit
						- I	
Agency's Project No.							Public Facility Other
	-						Other
ALUC REVIEW (TO	D BE COMPLETED BY ALUC EXECUTIVE	DIRECT	ΓOR)				
Application	Date Received				Ву		
Receipt	Is Application Complete?		Yes		No		
	If No, cite reasons						
Airport(s) Nearby							
Primary	Compatibility Zone(s)	П	A		B1		B2
Criteria	Allowable (not prohibited) Use?		Yes		No		
Review	Density/Intensity Acceptable?	_	Yes		No	-	
	Open Land Requirement Met?	_	Yes		No		
	,		Yes		No	-	
	Height Acceptable? Easement/Deed Notice Provided?					_	
	Easement/Deed Notice Provided?		Yes	Ш	No	ş	
Special Conditions	Describe:						
Supplemental Criteria	Noise						
Review	Safety						
	Airanaga						
	Airspace Protection						
	Overflight						
ACTIONS TAKEN (1	O BE COMPLETED BY ALUC EXECUTIVE	E DIREC	CTOR)				
ALUC Executive	☐ Approve					Dat	te
Director's Action	☐ Refer to ALUC						:
ALUC	Consistent					Dat	te
Action	Consistent with Conditions (list	conditio	ns/atta	ach a	dditior	nal pa	ges if needed)
	-						
	☐ Inconsistent (list reasons/attach	additio	nal pad	ges if	f need	ed)	
			- Is and			,	
August 2007							

A. NOTICE: Failure of an applicant to submit complete or adequate information pursuant to Sections 65940 to 65948 inclusive, of the California Government Code, MAY constitute grounds for disapproval of actions, regulations, or permits.

B. SUBMISSION PACKAGE:

ALUC	REV	IEW
-------------	-----	------------

1.... Completed Application Form 1. Project Site Plan — Folded (8-1/2 x 14 max.) 1..... Elevations of Buildings - Folded 1 Each . 8 ½ x 11 reduced copy of the above 1..... 8 ½ x 11 reduced copy showing project in relationship to airport. Floor plans for non-residential projects 1 Set 4 Sets. . Gummed address labels of the Owner and representative (See Proponent). 1 Set. . Gummed address labels of all property owners within a 300' radius of the project site. If more than 100 property owners are involved, please provide pre-stamped envelopes (size #10), with ALUC return address. 4 Sets. . Gummed address labels referring agency (City or County). 1..... Check for Fee (See Item "C" below)

STAFF REVIEW (Consult with ALUC staff planner as to whether project qualifies)

- Project Site Plans Folded (8-1/2 x 14 max.)
 Elevations of Buildings Folded
 8 ½ x 11 Vicinity Map
 Gummed address labels of the

 Owner and representative (See Proponent).
- 1 Set . Gummed address labels of the referring agency.
- 1 Check for review-See Below

1 Completed Application Form

C. FEE SCHEDULE (Effective August 14,2007): Approved by Resolution 2007-03:

ALUC REVIEW

Change of Zone; Conditional	Use Permit; Gen-	Specific Plan Review	
eral Plan Amendment; Parcel Map or Plot/Site		Initial Project Review	\$2,911.00
Plan Review and Variance		Amended Project Review	\$1,947.00
Initial Project Review	\$ 1,188.00	•	
Amended Project Review	\$ 792.00		
Tract Map Review		Community Plan Review	
Initial Project Review	\$1,353.00	Initial Project Review	\$3,300.00
•	• •	Amended Project Review	\$2,145.00
Amended Project Review	\$ 908.00	Amended Project Review	φ2, 1 4 5.00
General Plan Element Review		Environmental Impact Report	Review
Initial Project Review	\$3,300.00	Initial Project Review	\$2,723.00
Amended Project Review	\$2,195.00	Amended Project Review	\$1,815.00
Other Environmental Assessr	nents Review	Building Permit Review	
Initial Project Review	\$1,492.00	Initial Project Review	\$ 512.00
Amended Project Review	\$ 990.00	Amended Project Review	\$ 347.00
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E-Mailed: August 24, 2012 planning@la-quinta.org

August 24, 2012

Mr. Andrew Mogensen, AICP Principal Planner City of La Quinta P.O. Box 1504 78-495 Calle Tampico La Quinta, CA 92253

Review of the Draft Environmental Impact Report (Draft EIR) for the City of La Quinta General Plan Update Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff is concerned about the project's regional construction and operational air quality impacts. Specifically, the lead agency has determined that the project's construction and operational emissions will exceed the AQMD's CEQA significance thresholds for NOx, SOx, CO, VOC, PM10 and PM2.5 emissions impacts. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant air quality impacts. Further, the AQMD staff request that the lead agency provide additional information and clarification in the Final EIR on the project's Greenhouse Gas (GHG) Emission Reduction Plan and GHG significance determination presented in the Draft EIR. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

In V. Mr. Mill.

Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC120713-03 Control Number

Greenhouse Gas Emissions Analysis

1. Based on a review of the Draft EIR the lead agency has determined that the proposed project will achieve its greenhouse gas (GHG) reduction target of 10% below 2005 levels by 2020 and 28% below 2005 levels by 2035. Based on information presented on page IV-7 of the GHG Reduction Plan the lead agency established BAU using historical growth rates (2005 baseline data) within city limits. As a result, the lead agency applied this same growth rate to land area outside of city limits and in the project's sphere of influence (SOI). However, it does not appear that the land outside of the lead agency's jurisdiction and in the SOI (see Figure I-5 of Draft EIR) has a growth potential that is consistent with the growth rates assumed in the BAU analysis. Specifically, it does not seem appropriate to allocate the same growth rate to land in the city limits boundary and land in the SOI boundary given the existing lower density rural designation within the SOI. Therefore, the AQMD staff requests that in light of a recent court ruling regarding BAU analysis¹ the lead agency demonstrate that the BAU analysis properly captures the growth potential in the city's sphere of influence and provide clarification about the use of this rate to establish the project's BAU emissions value.

Regional Plan Consistency

2. The lead agency indicates that the population, housing and employment growth rates in the GHG Reduction Plan were provided by the Southern California Association of Government (SCAG). However, the lead agency does not provide any quantitative analyses or measures to demonstrate that the project is consistent with the recent Sustainable Community Strategy (SCS) adopted by the SCAG. Therefore, the final CEQA document should provide a quantified analysis demonstrating consistency with the 2012 Regional Transportation Plan/SCS.

Mitigation Measures for Operational Air Quality Impacts

3. The lead agency's operational air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NOx, SOx, CO, VOC, PM10 and PM2.5 emissions impacts. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this large source of emissions. Specifically, the lead agency requires nominal mitigation measures in the Draft EIR that lack emission reduction targets and specificity relative to the mobile source emissions. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating additional transportation mitigation measures from the greenhouse gas quantification report² published by the California Air Pollution Control Officer's Association and by revising mitigation measures 1 through 6 on

¹ Friends of the Northern San Jacinto Valley et al., v. County of Riverside et al. (Villages of Lakeview, April 2012)

D-1

D-2

D-3

² California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

page III-35 of the Draft EIR to provide specific emission reduction targets in the Final EIR. Further, the lead agency should be mindful of significant mobile source reductions that are needed in the near future for the South Coast Air Basin to achieve Federal Clean Air Standards by 2023 and 2030³.

Construction Equipment Mitigation Measures

- 4. The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements.

D-4

³ See page six (6) of the Powering the Future Document accessed at: http://www.aqmd.gov/pubinfo/images/cover-spread.jpg

CITY OF COACHELLA



1515 Sixth Street, Coachella, California 92236

PHONE (760) 398-3502 • FAX (760) 398-8117 • WWW.COACHELLA.ORG

August 27, 2012

Mr. Andy Mogensen, AICP City of La Quinta Planning Department P. O. Box 1504 La Quinta CA 92253

Subject: La Quinta General Plan Update Draft Environmental Impact Report (DEIR)

Dear Andy:

The City of Coachella would like to thank your staff and consultants for including the City of Coachella, throughout your process, in the La Quinta General Plan Update. We had the privilege of meeting with you during the early planning stages and discussed items of mutual concern. We are excited to see the latest documents that are now approaching the public hearing process. Upon closer review of the documents, the City of Coachella would like to register the following comments regarding the draft documents.

- 1) The Preferred Alternative Land Use Plan (Exhibit I-5) shows the entire geographic area bounded by Jackson Street, Airport Boulevard, Harrison Street and the Coachella City boundary as "Low Density Residential" except for two areas of "Community Commercial" at SW corner of Van Buren and Avenue 53, and on the west side of Harrison Street between Airport Boulevard and Avenue 60 (north of Avenue 54). The City is concerned about this blanket designation for the following reasons.
 - a) The preferred land use plan deviates from the Vista Santa Rosa Land Use Concept Plan (VSRLUCP) with respect to the clustering of densities at the Village Center near Coachella Valley High School. The City of Coachella believes that "Medium High Density Residential", "High Density Residential", "Village Center" and "Community Center" uses identified in the VSRLUCP at Calhoun Street and Airport Boulevard are beneficial to the long term quality of life in the area. The City of Coachella would encourage the creation of a neighborhood center similar to what is envisioned in the VSRLUCP in order to reduce vehicular trips for the commercial needs of nearby residents, and to have a cluster of density near the existing High School to promote walking routes to school.
 - b) The intersection of Van Buren Street and Avenue 52 in Coachella has approximately 160 acres of undeveloped land designated for General Commercial uses. Commercial land developers have studied this intersection as a future node for regional commercial and medical office uses. This area has the potential to become a significant employment center. The City of Coachella is in favor or designating the land north of Avenue 53 and east of Calhoun Street to include "Medium Density" and "High Density" Residential uses to cluster homes near this future employment center.

F-1

- 2) The proposed roadway diagram for Harrison Street south of Airport Boulevard is shown as a Major Arterial consisting of six lanes with a raised median. Please note that the City of Coachella has approved a policy document for Harrison Street between Avenue 54 and Highway 111 ("Harrison Street Corridor Study") that calls for a de-emphasized roadway with four lanes of travel and parallel parking on the street. It is our desire to shift regional traffic onto Van Buren Street and Calhoun Street as future north-south arterial streets within Coachella. In addition to anticipated future commercial uses and possible expansion of the Augustine Casino, the Van Buren and Calhoun Street corridors will provide connectivity between planned community parks at Van Buren and Avenue 49 (Rancho Las Flores) and at Avenue 50 and Calhoun Street (La Colonia Park). The City of Coachella would encourage policies that would require a transitioning section of Harrison Street between Avenue 58 and Airport Boulevard to reduce the number of lanes for north-bound traffic into Coachella.
- 3) The draft Circulation Element diagram as shown in Exhibit III-18 identifies the major roadway arterials on the traditional section lines throughout La Quinta's sphere of influence (i.e., Avenue 54, Airport Boulevard, Jackson Street, Van Buren Street, Avenue 58, and Avenue 60, etc.). While a majority of Coachella's arterials have not been developed, we see this as an opportunity to enhance connectivity by including the ½-mile connecting roadways as much as possible into the General Plan network. Accordingly, the City of Coachella will be including Avenue 53, Avenue 55, Avenue 57, Avenue 59, and Avenue 61 into the Circulation Element. Similarly, we will be including Calhoun Street, Frederick Street and Shady Lane as north-south arterial streets to distribute the traffic in a manner that would allow all arterial streets to be no larger than a four-lane roadway. The City of Coachella would encourage smaller block distances between arterial streets to discourage highway-type arterials and encourage pedestrian-friendly streets that provide access to local commercial and public uses within identifiable neighborhood centers. The City has an over-arching goal to improve the health of our residents through the built environment by promoting walkable communities, improving opportunities for short distance non-motorized travel, and improve access to parks and recreational uses.

Thank you again for this opportunity to comment and we look forward to sharing our draft General Plan documents with you and your staff as they become available. Please contact me at (760)398-3102 if you have further questions regarding this matter.

Sincerely,

Luis Lopez

Development Services Director

Pais Poper

Xc: David Garcia, Jonathan Hoy

E-2

E-3



Franz W. De Klotz - Div. 1

Established in 1918 as a public agency

Coachella Valley Water District

AUG 27 2012

CITY OF LA QUINTA PLANNING DEPARTMENT
Officers:

Directors:
Peter Nelson, President - Div. 4
John P. Powell, Jr., Vice President - Div. 3
Patricia A. Larson - Div. 2
Debi Livesay - Div. 5

Steven B. Robbins, General Manager-Chief Engineer
Julia Fernandez, Board Secretary

Redwine and Sherrill, Attorneys

File: 1150.14

August 22, 2012

Andrew Mogensen, AICP Principal Planner City of La Quinta Post Office Box 1504 La Quinta, CA 92253

Dear Mr. Mogensen:

Subject: Notice of Completion of a Draft Environmental Impact Report for the City of La Quinta General Plan Update

Thank you for affording the Coachella Valley Water District (CVWD) the opportunity to review the Notice of Completion of a Draft Environmental Impact Report (DEIR) for the La Quinta General Plan Update. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management services to a population of almost 300,000 throughout the Coachella Valley in Southern California.

At this time, CVWD submits the following comments regarding the DEIR:

1.	Where applicable throughout the DEIR, references should be made to the 2010 Coachella Valley Water Management Plan Update (approved in January 2012), the Coachella Valley Multiple Species Habitat Conservation Plan, and the Thomas E. Levy Groundwater Recharge Facility.	F-1
2.	<u>Page M-9, Environmental Summary Matrix</u> : Under the "Existing Conditions" heading, "Hydrology" is misspelled.	F-2
	Please revise first sentence under "Hydrology" to state: "Analysis and design of regional flood control structures is the responsibility of CVWD".	F-3
	Please revise the last sentence of the first paragraph under "Hydrology" to state "the Bear Creek System, the East La Quinta Channel System, Dike No. 2, Guadelupe Dike, and Dike No. 4."	F-4
	In reference to the second paragraph under the "Project Impacts" heading, please note that the portion of the Coachella Valley Stormwater Channel within the Planning Area is not a "levee", and most of this section has slope protection.	F-5

3.	<u>Page M-10, Environmental Summary Matrix</u> : In the last sentence of the third paragraph under the headings "Existing Conditions" and "Water Resources/Quality", please revise to read: "CVWD estimates the annual overdraft for 2010 to be 7,457 acre-feet."		F-6
4.	Page II-12: Please revise the third paragraph to read "which drains an approximate 1,069-square-mile watershed at Indio" or "which drains an approximate 1,525-square-mile watershed at the Salton Sea".		F-7
	In the last paragraph, please replace "Whitewater River" with "Whitewater River Stormwater Channel".]	F-8
5.	Page II-13: Under the heading "Domestic Water Resources", please revise the second sentence to the following: "It uses wells to extract groundwater which naturally recharges from mountain runoff. Natural recharge is supplemented by replenishment programs supplying supplemental water to the Thomas E. Levy Groundwater Recharge Facility near Dike No. 4 and at the Martinez Canyon Pilot Groundwater Recharge Facility near Martinez Canyon."		F-9
	Under the heading "Whitewater River Subbasin", please revise the last sentence of the first paragraph to state "Lower Whitewater River Subbasin Area of Benefit." In the first sentence of the second paragraph, please revise to read "groundwater use in the Whitewater River Subbasin has been steadily increasing to a point where demand has exceeded natural supplies."		F-10 F-11
6.	<u>Page II-20</u> : In the third sentence of the first paragraph under "Domestic Water", please revise to read "and south and east of the Planning Area at the Thomas E. Levy Groundwater Recharge Facility near Dike No. 4 and at the Martinez Canyon Pilot Groundwater Recharge Facility near Martinez Canyon."		F-12
	In the last two sentences of the paragraph under "Wastewater Services", please replace "Mid-Valley Water Reclamation Plant" with "Water Reclamation Plant No.4".		F-13
7.	Page III-104: In the first sentence of the paragraph under "Regional Stormwater Management", please revise to read: "Analysis and design of regional flood control Structures is the responsibility of CVWD". Please revise the second to last sentence]	F-14
	to read "include the Coachella Valley Stormwater Channel, Whitewater River Stormwater Channel, the La Quinta Evacuation Channel, the Bear Creek System, the East La Quinta Channel System, Dike No. 2, Guadalupe Dike, and Dike No. 4."		F-15

Please revise the first four sentences in the first paragraph under "Whitewater River/Coachella Valley Stormwater Channel" to read: "The Whitewater River, which flows into the Coachella Valley Stormwater Channel in the Planning Area, is the principal drainage course in the City, extending through the Coachella Valley for 50 miles, with an average cross-section of 350 feet. The Channel is generally dry, but may be inundated during storm events. Most of the Coachella Valley Stormwater Channel sections within the City have reinforced slope protection; the remaining portions are protected by unreinforced earthen berms."	F-16
Please revise the first sentence of the second paragraph to read: "The aforementioned reinforced slopes and remaining unreinforced earthen banks are classified by FEMA as "Provisionally Accredited Levees", indicating that they provide protection from the 100-year flood."	F-17
8. Page III-105: Please revise the last sentence under "Bear Creek System" to read: "CVWD has applied for FEMA accreditation of the Bear Creek Channel System including the training dike, and is awaiting receipt of the formal accreditation letter."	F-18
In reference to the last sentence of the paragraph under "Oleander Reservoir", the Standard Project Flood elevation is projected to be 54 feet at the reservoir; please verify 44-foot elevation associated with the 100-year flood.	F-19
9. Page III-106: In reference to the first two sentences of the first paragraph under "Dikes", please note that the dikes were constructed to protect agricultural lands. Also, the Eastside Dike is not located within an area covered by the City's General Plan Update.	F-20 F-21
10. <u>Page III-110</u> : Please revise the first two sentences of the first paragraph under "Levee Failure and Seiching" to read: "There are several major stormwater or irrigation facilities located in the Planning Area including the Coachella Valley Stormwater Channel, Coachella Canal, and Lake Cahuilla."	F-22
In the first sentence of the second paragraph, please replace "sand levees" with "banks" or "levees".	F-23
11. <u>Page III-238</u> : Please revise the second sentence of the third paragraph under "Existing Conditions" to read: "Although Colorado River water is one of the Coachella Valley's main sources of water, it has elevated levels of salinity. This water has been cited as contributing to the elevated salinity levels found in the Valley."	F-24
12. <u>Page III-239</u> : Please revise the last sentence of the first paragraph under "Thermal Subarea" to read: " increased pumpage has lowered groundwater levels in the lower portion of the Whitewater River subbasin."	F-25

Please revise the first sentence of the third paragraph to read: "The upper and lower aquifer zones of the Thermal subarea"	F-26
Please revise the first sentence under "Regional Water Supply and Demand" to read: "The Coachella Valley's principal domestic water source is groundwater."	F-27
13. <u>Page III-240</u> : Please revise the first and second sentences under "Regional Water Supply" to read: "Domestic water is provided in the City and most of the sphere by CVWD. Groundwater is the primary source for this water supply."	F-28
In the first sentence of the second paragraph, please add "Area of Benefit" after "Subbasin".	F-29
Please revise the last sentence of the third paragraph to read: "the annual balance in the Area of Benefit for 2010 was estimated to be -7,457 acre-feet. 109" And please add this sentence: "The cumulative overdraft for the Area of Benefit through 2010 is estimated to be 4,497,609 acre-feet. 109"	F-30
Under "Historic and Current Consumption", please add "Area of Benefit" after "Subbasin".	F-31
14. <u>Page III-241</u> : Please revise the title of Table III-50 to "Coachella Valley Water District Annual Water Production Within the Lower Whitewater River Subbasin Area of Benefit."	F-32
Under "Domestic Water Facilities", please update data to include the following: "CVWD has 102 active wells, 59 reservoirs, and in 2011 delivered 102,805 acre-feet of water to a population of 286,240."	F-33
15. <u>Page III-243</u> : Please replace " and the Mission Creek subbasins" with "and the Mission Creek Subbasin Areas of Benefit" in the second and third paragraphs on this page."	F-34
16. <u>Page III-244</u> : Please revise the heading " <i>Reclaimed Water/Tertiary Treated Water</i> " to " <i>Recycled Water/Tertiary Treated Water</i> ". In the second sentence under this	F-35
heading, please revise to state " of which two have facilities to treat wastewater" and add this sentence after the second sentence: "A third CVWD water reclamation plant produces secondary treated water suitable for irrigation where uses are restricted."	F-36
17. <u>Page III-245</u> : In the next to last sentence of the first paragraph on the page, please replace "turn" with "turf".	F-37

18. <u>Page III-246</u> : Please revise the fourth and fifth sentences of the second paragraph under "Water Quality" to read: "In some areas, low levels of naturally-occurring arsenic have been found. CVWD has three ion exchange treatment facilities for arsenic removal; these are located in the Mecca and Thermal areas."	F-38
19. <u>Page III-247</u> : Please revise the second and third sentences under "Total Dissolved Solids" to read: "The secondary MCL for TDS includes an upper level of 1,000 milligrams per liter (mg/L) and a short-term level of 1,500 mg/L. Based on CVWD domestic well monitoring data for 2009, TDS levels ranged from 150 to 980 mg/L."	F-39
Under "Nitrates", please remove the "s" from "commons" in the second sentence of the first paragraph.	F-40
20. <u>Page III-248</u> : Please revise the first sentence of the fourth paragraph on the page to read: "The primary water quality issues in the Coachella Valley are salinity and nitrates." Please add "River" after "Whitewater" in the second sentence.	F-41
21. <u>Page III-252</u> : Please replace "reclaimed" with "recycled" in the last sentence of the first paragraph under "Impacts to Water Supply Resources".	F-42
22. <u>Page III- 254</u> : In the third sentence of the first paragraph, revise to read "established thresholds for domestic water" and place a comma after "chromium-6" in the last sentence.	F-43
In the third sentence under "Nitrates", please revise to read "nitrate concentrations in domestic water provided by CVWD range from "not detected" to a maximum of 40 mg/L."	F-44
23. <u>Page III-255</u> : Please remove the "s" from "impacts" in the first sentence of the first full paragraph.	F-45
24. Exhibit III-10: The Coachella Valley Stormwater Channel is mislabeled as the "Whitewater River".	F-46

If you have any questions, please call Luke Stowe, Senior Environmental Specialist, extension 2545.

Yours very truly,

Mark L. Johnson

Director of Engineering





LS:pr/eng/env/12/aug/LQ Gen Plan Update





Traffic Engineering

Air Quality Studies

Noise Assessments

August 27, 2012

Mr. David Lennon Hofmann Land Development Co. P.O. Box 758 Concord, CA 94522

SUBJECT: Comments on the La Quinta 2035 General Plan Circulation Element Update Traffic Impact Analysis and DEIR Related to the Travertine Specific Plan

Dear Mr. Lennon;

Endo Engineering has reviewed the "City of La Quinta General Plan Circulation Element Update Traffic Impact Analysis" (TIA), dated May 14, 2012, by Iteris, Inc and DEIR. The traffic analysis reviewed was downloaded from the City of La Quinta 2035 General Plan Update website as Appendix H of the "Draft EIR for the City of La Quinta General Plan" (dated July 2012) prepared by Terra Nova Planning and Research, Inc. The 45-day DEIR review period ends on August 27, 2012. Our review focuses on those aspects of the traffic impact analysis that may affect the Travertine Specific Plan.

The three potential access routes to the Travertine Specific Plan are Madison Street, Avenue 62, and Jefferson Street. The future traffic volumes and levels of service along these routes upon General Plan buildout must be provided to determine if they are consistent with current development plans. For example, the travel demand for Madison Street, between Avenue 60 and Avenue 62, is important to identify so that the roadway can be appropriately sized. Given the cost of the bridge required to construct this roadway connection, a realistic future traffic projection is needed for this roadway segment. Without this projection, it is difficult to appropriately size the other access roadways that will serve the Travertine Specific Plan.

The classification of Jefferson Street, north of the Travertine site, will need to be considered when the Travertine Specific Plan is amended in the future. In view of the topographic constraints to be overcome to construct this roadway, an appropriate classification must be identified to provide sufficient but not excess capacity. However, this roadway was not evaluated in the TIA and no future traffic projection was provided for Jefferson Street, between Avenue 58 and Avenue 62.

Another critical issue the City has been struggling with for many years is the magnitude of future regional travel demands on Avenue 62, Monroe Street, and Madison Street associated with the South Valley Parkway Implementation Program. The TIA does not provide volumes on many of these streets that would be necessary to identify the future regional through-traffic volumes in this area. Based upon the projected peak hour traffic volumes at Intersection 37, regional through traffic utilizing Avenue 62 appears to be minimal.

General Comments on the General Plan Update and DEIR

1. As shown in General Plan Exhibit II-10, EIR Exhibit III-20, and Table 10 of the TIA, future traffic projections are not provided for several General Plan roadway segments that are critical to the development of the Travertine Specific Plan. Future traffic projections are needed for: (1) Avenue 62, west of Madison Street; (2) Avenue 58, west of Madison Street; (3) Jefferson Street, north of Travertine; (4) Madison Street, north of Avenue 62; and (5) Avenue 60, west of Madison Street.

Section 6.3 of the TIA (Page 52) indicates that the growth in raw LQTAM volumes between the year 2009 and the year 2035 was added to the existing 24-hour volumes from CVAG to obtain forecast year 2035 daily volumes. However, future traffic projections were not evaluated for some General Plan roadway segments that were included in the CVAG "Traffic Census Report". For example, CVAG provided existing daily traffic count data for three segments along Airport Boulevard (east of Madison Street, east of Monroe Street, and east of Jackson Street). Future traffic projections were not provided in the TIA for these roadway segments.

It can be seen from General Plan Exhibit II-10, EIR Exhibit III-20, and Table 10 of the TIA, that numerous master planned roadway segments were not included in the CVAG "Traffic Census Report" and therefore have no future traffic projection. Without future traffic projections, the adequacy of the master planned roadway classifications for many General Plan roadway segments, particularly those in the developing areas of southeast La Quinta, cannot be verified.

Future traffic projections are necessary for all of the General Plan roadway links to ensure that future traffic studies properly address General Plan buildout traffic conditions. Will year 2035 LQTAM daily traffic projections be made available to enable future traffic studies to evaluate General Plan buildout traffic volumes? As a minimum, the raw LQTAM volumes for the year 2009 and the year 2035 should be provided for those roadway links where no count data was provided in the CVAG "Traffic Census Report".

- 2. In Appendix H of the DEIR, page 12 of the TIA refers readers to Appendix A for the traffic count data used in the traffic study. Appendix A of the TIA was not provided on the City website and should be made available for review.
- 3. In Appendix H of the DEIR, page 32 of the TIA references the "LQTAM Model Documentation and Validation Report" (dated February, 2011) prepared by Iteris, Inc. This report is critical and should be provided on the City website or at a minimum made available upon request. Based upon the existing CVAG counts and the portion of the land in southeast La Quinta that has been developed to date, it appears that the future traffic projections along Madison Street are substantially higher than expected. The rationale for the additional future traffic is not provided in the TIA. Consequently, the calibration of the model in this area is of particular interest and should be reviewed.

Specific Comments Related to the Travertine Specific Plan

The Travertine Specific Plan was originally approved in 1994 with a total trip generation of 27,300 daily trips and included the development of 2,300 dwelling units, 100,000 square feet of retail, and a 500-room hotel. Access to the Travertine Specific Plan was planned via three streets, the primary access from Madison Street, and minor access from Avenue 62 and from Jefferson Street/Avenue 58.

In 2008, a proposed amendment to the Travertine Specific Plan included 1,400 dwelling units and a 500-room hotel generating 17,390 daily trips. The amended proposal represented a 39 percent

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decrease in dwelling units, and a 36 percent decrease in total trip generation. From a capacity perspective, the Travertine Specific Plan area could be served by two two-lane roadways, or one 4-lane roadway. In view of the high cost of constructing off-site roadway improvements to provide access to the project site, it is critical that the access be appropriately sized. Therefore, the access streets of Madison Street, Jefferson Street, and Avenue 62 near the Travertine Specific Plan need to be carefully evaluated to ensure that a sufficient, but not excessive capacity is provided.

Madison Street

4. In Exhibit 5 of the TIA, the existing turning movement volumes for the intersection of Madison Street and Avenue 60 (Intersection 32) appear to be too high, unless the volumes represent primarily construction traffic. The six existing homes accessed via Avenue 60, west of Madison Street, should not generate 66 morning peak hour and 43 evening peak hour trips on this segment of Avenue 60. Furthermore, the primary traffic movement associated with these residents should be to/from the north, not to and from the east via Avenue 60. Traffic count data from 2008 that shows 18 vehicles in the morning peak hour and 6 vehicles in the evening peak hour on this leg of Avenue 60. Given the questionable existing traffic count data, the existing turning movements at this intersection should not be used as the basis to project the future turning movements. Doing so results in unrealistically high projections for Avenue 60, west of Madison Street. It also results in more northbound vehicles on Madison Street turning left into a relatively small low-density residential area via Avenue 60 than continuing northbound through the intersection toward the commercial and employment opportunities in the more developed portions of La Quinta.

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- 5. General Plan Exhibit II-2 and EIR Exhibit III-18 incorrectly identify Avenue 62 as a modified 2-lane divided secondary arterial between Madison Street and Monroe Street. However, Figure 4 of the TIA correctly shows that Avenue 62, between Madison Street and Monroe Street, is a 2-lane undivided Modified Collector Street.
- 6. General Plan Exhibit II-2 and EIR Exhibit III-18 incorrectly identify Monroe Street, between Avenue 60 and Avenue 62, as a four-lane undivided Secondary Arterial. This segment of Monroe Street is currently classified as a Modified Secondary Arterial A (which is a two-lane divided roadway with a lower capacity that a four-lane undivided roadway).
- 7. General Plan Exhibit II-2, EIR Exhibit III-18, and the TIA Figure 4 identify Madison Street, extending between Avenue 60 and Avenue 62 as a Modified Secondary Arterial A. However, all of the future base maps in the TIA incorrectly show a break in Madison Street where it crosses the dike, south of Avenue 60. The future base maps should show that Madison Street will be connected between Avenue 60 and Avenue 62.
- 8. TIA Figure 6 shows an existing bicycle route passing through the intersection of Madison Street and Avenue 62. The intersection of Madison Street and Avenue 62 does not currently exist. Therefore, a bicycle route through this intersection does not currently exist. On the City's website, the "City of La Quinta Bike Map" only extends south to Avenue 60. Therefore, it does not show an existing bike route extending through the intersection of Madison Street and Avenue 62.
- 9. General Plan Table II-12, EIR Table III-48, and Table 10 of the TIA show Madison Street (between Avenue 54 and Airport Blvd.) with a projected future traffic volume of 47,529 vehicles per day. This future projection is much higher than expected, based on development trends and trip generation studies in this area. Since the land south of this point is nearly 50 percent developed and the CVAG peak season daily traffic count for Madison Street is currently less than 10,000 vehicles per day, it appears unlikely that the General Plan buildout daily volume will exceed 30,000 ADT.

The major specific plans in this area have been developing at approximately 50 percent of the densities permitted under the existing entitlements. In addition, the trip generation studies of developments such as PGA West and Trilogy have identified trip-generation rates consistent with age-restricted senior residential developments. The trip generation of residential developments in this area has been approximately 30 percent of the trip generation rates associated with traditional single-family residential dwellings. Extensive traffic counts at the access points to PGA West have identified a trip generation rate that is 35 percent of the traditional single-family residential trip generation rate, even though PGA West is not an age-restricted community.

Was the trip generation assumed in the modeling for development in this area based upon the entitlements, census data, or the actual development that has occurred? How did the calibration run for existing development compare to the existing traffic volumes for Madison Street, between Avenue 54 and Airport Blvd.? The calibration run probably shows existing traffic projections much higher than the existing traffic count data. This would indicate that both the residential development intensities and trip-generation rates assumed for this area in the model were too high.

- 10. Figure 11 of the TIA shows year 2035 turning movement projections at the intersection of Madison Street and Avenue 60 (Intersection 32) that are not reasonable for this location. They indicate that approximately one-half of the northbound traffic on Madison Street turns west at Avenue 60. The northbound left-turn volume (from Madison Street onto Avenue 60) is projected to exceed the northbound through volume during the evening peak hours. At this intersection there should be very little traffic making a northbound left-turn movement since the west leg of Avenue 60 only serves a very small low-density residential development area.
- 11. Figure 13 of the TIA shows enhanced intersection treatments at Intersection 32 required because the traffic volume assigned to Avenue 60, west of Madison Street, was unrealistically high. There is minimal development planned west of Madison Street (low-density residential uses) with access to Madison Street opposite Avenue 60. Furthermore, Avenue 60, west of Madison Street is constructed as a local street with 36 feet of pavement that would not accommodate the four lanes of through traffic and dual eastbound left-turn lanes shown in Figure 13. There is a large development planned west of the existing Andalusia development, but its future access to Madison Street is planned midway between Avenue 60 and Avenue 58, not at Avenue 60.
- 12. Page 40, 41, and 50 of the TIA, describe enhanced improvements recommended for Intersection 32 (Madison Street and Avenue 60). See Comment 10 and 11. This recommendation should be revised because the assumptions in the model for this intersection are not correct.

Avenue 62

13. General Plan Table II-12, EIR Table III-48, and Table 10 of the TIA show a future volume of 9,624 vehicles per day for Avenue 62, between Madison Street and Monroe Street. However, Figure 11 shows that very little peak hour traffic is projected on Avenue 62, immediately west of Monroe Street (only 90 evening peak hour trips or approximately 1,100 daily trips). This seems to indicate that essentially all of the 9,624 vehicles per day were assigned to Avenue 62 from adjacent future land uses located south of Avenue 62 and traveled west to Madison Street then north to Avenue 60. The Keck property is located south of Avenue 62 and west of Monroe Street. It is our understanding that future development plans for the Keck property included access primarily to Monroe Street, south of Avenue 62. Only minimal emergency access was planned from the Keck property to Avenue 62, west of Monroe Street. The location of the node connectors from the Keck Property to Avenue 62 and/or Monroe Street were not

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documented in the TIA or DEIR. However, a nodal connection should not be assumed between the Keck property and Avenue 62.

14. General Plan Table II-12, EIR Table III-48, and Table 10 of the TIA incorrectly identified Avenue 62, between Madison Street and Monroe Street, as a 4-lane Modified Collector with a daily capacity of 28,000 vehicles per day, rather than a 2-lane Modified Collector with a daily capacity of 14,000 vehicles per day. If the traffic network in the model incorrectly assumed the speed for a four-lane roadway for Avenue 62, between Madison Street and Monroe Street, it would attract more future traffic than the correct two-lane Modified Collector designation resulting in a future volume projection that is unrealistically high.

G-14

15. Figure 11 of the TIA shows a morning plus evening peak hour volume for Intersection 37 (Monroe Street at Avenue 62) of 26 in the eastbound direction, and 3 in the westbound direction. How was this traffic distribution determined? The atypical directional split seems to imply that all vehicles are going eastbound on Avenue 62 past Monroe Street in the peak hours and essentially no vehicles return in the westbound direction on Avenue 62 in the peak hours.

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16. Figure 12 of the TIA shows the future lane geometrics for Intersection 37 (Monroe Street at Avenue 62) with two westbound through approach lanes opposite a single westbound exit lane on Avenue 62 serving a peak hour westbound through volume of only 3 vehicles per hour. As a Modified Collector, Avenue 62 will only provide one through lane in each direction between Monroe Street and Madison Street.

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17. Figure 12 and 13 of the TIA show that Intersection 37 (Monroe Street at Avenue 62) will have a traffic signal in the future, but the volumes shown on Figure 11 for Intersection 37 would not meet traffic signal warrants. The westbound right-turn volume should not be included as part of the westbound approach volume because of the recommendation for an exclusive westbound right-turn lane and the right-turn movement does not conflict with the large southbound left-turn movement.

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18. The mitigation assumed for Intersection 37 was not appropriate to mitigate the impact at this intersection. Table 8 of the TIA shows Intersection 37 operating at LOS E during the evening peak hour. Footnote 3 states that signalization of the existing lanes was assumed for this intersection. This footnote is not correct because the text referencing Table 8 states that the analysis is based upon the future lane configurations shown in Figure 11 and the future approach lanes in Figure 11 are not the same as the existing approach lanes at Intersection 37. Traffic signals would not be installed because signal warrants are not met by these volumes.

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Jefferson Street

19. The TIA did not provide any future traffic projections or level of service analysis for Jefferson Street between Avenue 58 and Avenue 62 (at Madison Street). In order to understand how the TIA addresses future development in the Travertine Specific Plan area, it is critical to at least provide year 2035 traffic volumes and identify the trip generation assumed for Section 5 and the surrounding development areas.

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Other Comments

20. As discussed in Comment 13, the LQTAM appears to project approximately 9,000 daily trips on Avenue 62 generated by the future development of the Keck property (located south of Avenue 62 between the dike and Monroe Street). Based upon the LQTAM projections, future traffic will access the Keck property by crossing the dike and using Madison Street to travel to/from the north. If this is the case, the future traffic generated by the development of the Keck property would comprise a sizeable portion of the traffic utilizing the future Avenue 62 crossing

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of the dike as well as the future bridge needed to extend Madison Street from Avenue 60 to Avenue 62. Consequently, the developers of the Keck property would be responsible for paying their fair-share percentage of the construction of the dike crossing and the extension of Madison Street. It was our understanding that plans for the Keck property take access primarily from Monroe Street (south of Avenue 62). The last Keck property plans that we saw did not have an access designed to take advantage of future roadway improvements to Avenue 62 and Madison Street on the west side of the dike. If the Keck Property takes access primarily from Monroe Street and only takes emergency access to Avenue 62, the traffic assignment to Avenue 62 and Madison Street should be eliminated in the model. This may also reduce the problematic traffic volume on Madison Street, south of Avenue 54, but may increase the demand on Monroe Street, north of Avenue 62.

21. The documentation provides no way to determine the trip generation assumed for the Travertine Specific Plan or the surrounding land uses located south of Avenue 58 and west of Monroe Street. Without this information, the Travertine development cannot verify that the modeled trip generation for this area is consistent with current development plans.

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We appreciate the opportunity to comment on the La Quinta General Plan Update TIA and DEIR. Since these documents will be critical in properly evaluating the future traffic impacts associated with the Travertine Specific Plan, it is vital that the information presented in the General Plan be correct and accurately reflect the future developments. Obtaining a clear understanding of the LQTAM will enable us to accurately identify the circulation needs of the Travertine Specific Plan as well as the needs of cumulative developments and regional through traffic.

ENDO ENGINEERING

Principal

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CITY OF INDIO

100 CIVIC CENTER MALL • INDIO, CA 92201 760.391.4000 • FAX 760.391.4008 • WWW.INDIO.ORG

August 24, 2012

Andrew Mogensen, AICP Principal Planner City of La Quinta P.O.Box 1504 78-495 Calle Tampico La Quinta, CA 92253



RE: NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE CITY OF LA QUINTA GENERAL PLAN UPDATE.

Mr. Mogensen,

As requested by you we have reviewed the July 2012 City of La Quinta General Plan Draft Environmental Impact Report (Draft EIR), including the Transportation/Traffic portions prepared by Terra Nova Planning & Research as well as Appendix H to the Draft EIR, the May 14, 2012 of the City of La Quinta General Plan Circulation Element Update Traffic Impact Analysis prepared by Iteris.

While the Draft EIR mentions that several roadways and intersections are shared with other jurisdictions and while the Draft EIR suggests that cooperation and communication with adjacent jurisdictions is needed, there has been no meaningful communication with our City Traffic Engineer (Mr. Tom Brohard) during the preparation of the Traffic Impact Analysis (other than an introductory call from Iteris indicating that their work on this project had begun). In fact, the list of organizations, persons, and documents consulted shown in Section IX of the Draft EIR does not list or identify any persons or documents from the City of Indio or any other municipality. Rather than preparing their Draft EIR in a vacuum, the City of La Quinta consultants for this project should have discussed various recommendations with the City of Indio and others, particularly those involving

adding lanes within the City of Indio, to mitigate significant traffic impacts caused by intensified land use in the City of La Quinta and its sphere of influence.

The following comments pertaining to streets and intersections shared with La Quinta are submitted to you for consideration and for inclusion in the City of Indio comment letter on the La Quinta General Plan Draft EIR:

- 1) Existing Conditions Regional Roadways The discussion of State Highway 111 as a Regional Roadway beginning on Page III-204 of the Draft EIR should be modified to indicate that the State relinquished this roadway several years ago to the local cities and the only portion of State Highway 111 that remains in the Coachella Valley is in the City of Palm Springs. The Highway 111 discussion should also be moved into the discussion of Local Major Highways beginning on Page III-205 of the Draft EIR.
- 2) Roadway Segment Analysis for General Plan Buildout Table III-48 beginning on Page III-221 of the Draft EIR contains some significant spikes in future traffic volumes from block to block. These increases do not appear to be reasonable as the adjacent properties are mostly developed at this time. The following Year 2035 ADT forecasts on roadways shared with the City of Indio require further validation:
 - a. <u>Jefferson Street from Avenue 48 to Avenue 50</u> In this segment, 2035 ADT volumes are 7,000 higher south of Avenue 48 and 18,000 higher north of Avenue 50 than the adjacent segments.
 - b. <u>Highway 111 from Dune Palms Road to Jefferson Street</u> In this segment, 2035 ADT volumes are 10,000 higher east of Dune Palms Road than the adjacent segment to the west.
 - c. <u>Avenue 48 from Dune Palms to Jefferson Street</u> In this segment, 2035 ADT volumes are 16,000 higher east of Dune Palms Road than the segment to the west.
 - d. <u>Avenue 50 from Jefferson Street to Madison Street</u> In this segment, 2035 ADT volumes are 14,000 higher east of Jefferson Street than the segment to the west.
- 3) Intersection Impact Analysis Table III-49 beginning on Page III-226 of the Draft EIR provides AM and PM Peak Intersection Analysis with 2035 buildout volumes during the peak season. The table should be expanded to indicate and more clearly disclose the additional lanes/traffic control measures that are required, particularly those additions in other jurisdictions including Indio. From Exhibit III-21 to achieve LOS "D" or better, the following additional lanes are needed according to the Draft EIR at the intersections that are shared between La Quinta and Indio:
 - a. <u>Jefferson Street and Fred Waring Drive</u> 50% Indio; 50% La Quinta Add westbound right turn lane in Indio.

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H-3

- b. <u>Jefferson Street and Highway 111</u> 75% Indio; 25% La Quinta Add 3rd southbound left turn lane and 4th southbound thru lane in La Quinta; add 4th northbound thru lane in Indio.
- c. <u>Jefferson Street and Avenue 50</u> 25% Indio; 75% La Quinta Add 2nd eastbound left turn lane in La Quinta; add 2nd westbound left turn lane and 2nd westbound thru lane in Indio.
- d. Madison Street and Avenue 50 75% Indio; 25% La Quinta The proposed lane additions in the Draft EIR have been modified by the Indio/La Quinta Project Development Team (PDT) working together on the improvement of Madison Street to eliminate the possible need for a third northbound thru lane in Indio. The Draft EIR should be updated to reflect the ultimate intersection geometry approved by the PDT on July 24, 2012. These lane additions in the City of La Quinta now include a 2nd eastbound thru lane and an eastbound right turn lane. Lane additions in the City of Indio now include a 2nd southbound left turn lane, a second southbound thru lane, and a southbound right turn lane; a 2nd northbound right turn lane, and a northbound right turn lane; and a 2nd westbound thru lane and a westbound right turn lane. A traffic signal will also be installed at this intersection.
- e. Madison Street and Avenue 52 25% Indio; 75% La Quinta The proposed lane additions in the Draft EIR have been modified by the Indio/La Quinta PDT working together on the improvement of Madison Street to eliminate the possible need for a third northbound thru lane in Indio. The Draft EIR should be updated to reflect the ultimate intersection geometry approved by the PDT on July 24, 2012. These lane additions in the City of La Quinta now include two southbound left turn lanes, a second southbound thru lane, and a southbound right turn lane; a 2nd northbound left turn lane and a 2nd northbound thru lane. Lane additions in the City of Indio now include a 2nd westbound thru lane. A traffic signal will also be installed at this intersection.
- f. Monroe Street and Avenue 52 50% Indio; 25% La Quinta; 25% County Add 2nd eastbound thru lane in La Quinta; add 2nd southbound left turn lane, 2nd southbound thru lane and southbound right turn lane in Indio; add 2nd westbound thru lane in Indio; add two northbound left turn lanes, a 2nd northbound thru lane, and a northbound right turn lane in the County.
- 4) Intersections Potentially Worse Than LOS "D" The underlying analysis in the Draft EIR is very conservative, having bumped up the October traffic counts by 10 percent to reflect higher volumes in January, February, and March. This baseline increase of 10 percent effectively translates to a drop in LOS from "D" to "E" at these intersections. Constructing costly additional improvements to maintain LOS "D" for the highest traffic volumes during three months of the year, when these intersections will operate at LOS "D" or better for the other

H-4

nine months of the year, is not justified during these difficult economic conditions.

Since our Circulation Plan Update in 2008, the City of Indio allows LOS "E" under certain conditions (see attached). Many other jurisdictions in California also allow LOS "E" under these or similar conditions. For intersections shared with the City of Indio, especially those where Indio has jurisdiction over 75 percent of the intersection, the City of La Quinta should reconsider its LOS "D" standard and also allow LOS "E" under certain conditions. Mitigation measures necessary to achieve LOS "E" should be identified and more clearly disclosed in separate tables and figures, together with identification of improvements that are required within the City of Indio. According to the Draft EIR, intersections shared between the Cities of La Quinta and Indio that may operate at worse than LOS "D" include:

a. Jefferson Street and Highway 111 – Only 25% of this intersection is in the City of La Quinta, with 75% of the intersection within the City of Indio. While adding a third SB left turn lane may be feasible, adding fourth northbound and southbound thru lanes on Jefferson Street will require additional right of way in the City of Indio. Both cities have constructed what are typically considered the maximum practical improvements at Jefferson Street and Highway 111 including dual left turn lanes, three thru lanes, and separate right turn lanes with green arrow overlaps on each approach. Further widening of the intersection which necessitates purchase of right of way and could result in other environmental impacts is not acceptable to the City of Indio. In accordance with the attached policy, LOS "E" conditions will therefore be acceptable if they should occur at buildout in Year 2035 during the peak season (January thru March) at Jefferson Street and Highway 111 in the City of Indio.

b.

c. Madison Street and Avenue 50 - Only 25% of this intersection is in the City of La Quinta, with 75% of the intersection within the City of Indio. The revised lane configurations approved by the Indio/La Quinta PDT will result in LOS "D" or better operating conditions in Year 2035. Further widening of the intersection which necessitates purchase of additional right of way and could result in other environmental impacts is not acceptable to the City of Indio. In accordance with the attached policy, LOS "E" conditions will therefore be acceptable if they should occur at buildout in Year 2035 during the peak season (January thru March) at Madison Street and Avenue 50 in the City of Indio.

Please feel free to contact us at 760-391-4120 with any question you may have.

Thanks,

Leila Namvar **Assistant Planner**

City of Indio

Community Development Department Planning Division



COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY



Transportation Department

August 27, 2012

Les Johnson, Planning Director City of La Quinta 78-495 Calle Tampico La Quinta, CA 92253

Subject: Draft Environmental Impact Report (DEIR) and City of La Quinta General Plan

City of La Quinta

Dear Mr. Johnson:

Thank you for the opportunity to review the City of La Quinta General Plan. We offer the following comments.

The Riverside County Transportation Department (RCTD) has reviewed the Circulation Element for the City of La Quinta General Plan. The County requests that any roadway designations within the City's Circulation Element that extend to the City/County boundary and the City's sphere of influence and that differ from the County's designations be coordinated with County staff. Specifically the RCTD has compared the City's Circulation Element to the County's current Circulation Element and the Circulation Element the County will be proposing in its own update to the County General Plan. The RCTD is primarily concerned with potential conflicts regarding the proposed designations on Harrison Street (former SR-86) and Avenue 62 within the City's Circulation Element.

Based on discussions with City staff, the County understands that Harrison Street was modeled for the City's General Plan as an 8 lane divided facility and that the City's traffic model demonstrated the need for a facility of this size. The County concurs that an 8 lane facility will need to be accommodated in the future for Harrison Street. However, as of the writing of this letter the last published version of the City's General Plan showed Harrison Street as a Major Arterial Highway (6 lanes divided within 128 feet of right-of-way). The County requests the City incorporate a cross-section for an 8 lane divided highway into the City's General Plan and that the designation of Harrison Street would be changed to that cross-section. The County requests that the City's cross-section would generally conform to the attached cross-section.

The City is proposing that Avenue 62 be designated as a Secondary Arterial Highway (4 lanes undivided within 102 feet of right-of-way). The County has previously analyzed this roadway in the South Valley Parkway Traffic Study and Roadway Phasing Plan dated April 4, 2007 prepared by Kimley-Horn and Associates, Inc. The conclusions of that study indicated that the portion of Avenue 62 that falls within the City's General Plan between Monroe Street and Harrison Street should be planned for four lanes within

I-1

1-2

Les Johnson, Planning Director Page 2 August 27, 2012

220-feet of right-of-way. The County has done additional traffic modeling of this corridor in connection with a proposed update of the County's General Plan using the RIVTAM model. The assumptions of model for the proposed General Plan incorporated approved Specific Plans within this portion of the County, but otherwise did not use the proposed land use assumptions of the South Valley Parkway. The General Plan update model analyzed the full future build-out of all unincorporated and incorporated areas beyond the 2035 horizon, and the model has indicated that traffic volumes on Avenue 62 will warrant at least a 6 lane divided facility at full build-out. The County continues to recommend that Avenue 62 should be designated in such as way that sufficient right-of-way will be preserved for the accommodation of ultimate future growth and that at a minimum will permit the construction of a 6 lane divided facility. The County believes that a minimum of 152 feet of right-of-way should be preserved for this roadway, especially between Jackson Street and Harrison Street.

The County has adopted Community Design Guidelines for an area known as Vista Santa Rosa (VSR). The boundaries of this community include the unincorporated portions of the City of La Quinta's General Plan, covering the City's current sphere of influence and extend further to the south between Avenue 62 and Avenue 66 on the north and south and between Monroe Street and Harrison Street on the west and east. The County requests that the City would cooperate with the County in preserving the VSR community identity within its full boundaries. The County desires that this area remain intact through inclusion within the sphere of influence of one city and that future planning would consider all portions of this community.

Thank you again for the opportunity to review the La Quinta General Plan and EIR. We appreciate your consideration of these comments:

Riverside County Administrative Center 4080 Lemon Street, 8th Floor Riverside, CA 92502

Sincerely,

Farah Khorashadi, P.E.

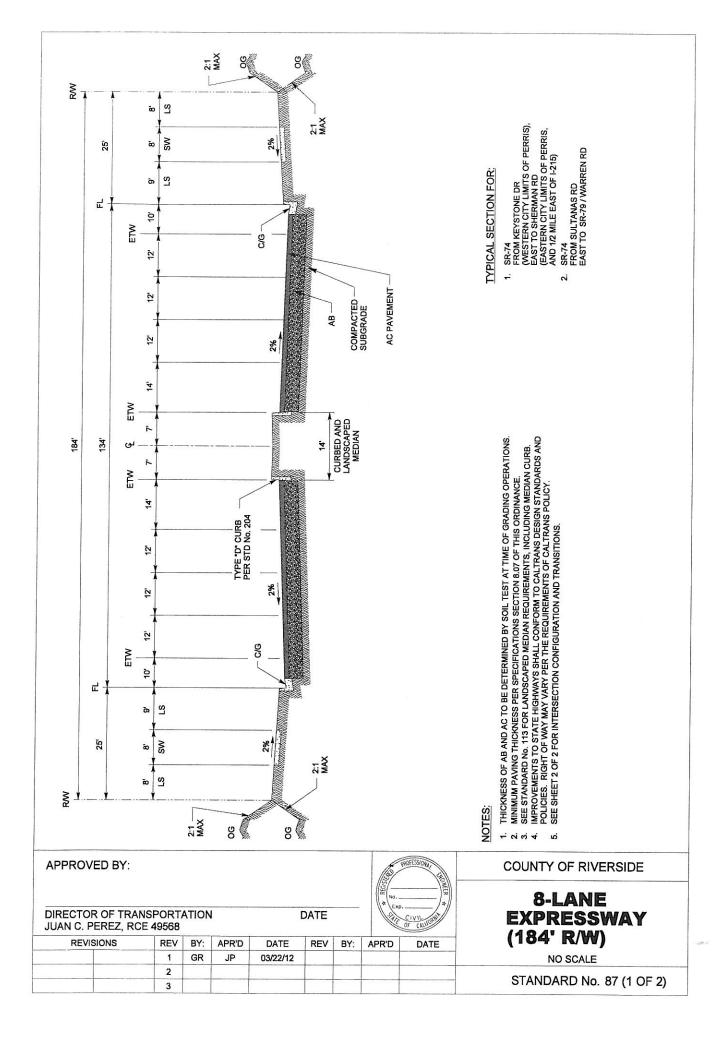
Engineering Division Manager

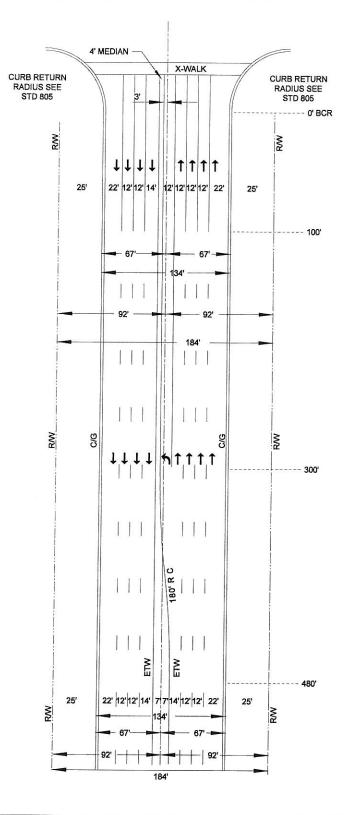
farah Khorashadi

RF:FK:rg

Attachment – Standard No. 87 "8-Lane Expressway"

cc: Juan C. Perez, Director of Transportation and Land Management Patricia Romo, Deputy Director





TYPICAL SECTION FOR:

SR-74
FROM KEYSTONE DR (WESTERN CITY LIMITS OF PERRIS),
EAST TO SHERMAN RD (EASTERN CITY LIMITS OF PERRIS,
AND 1/2 MILE EAST OF I-215)
SR-74
FROM SULTANAS RD
EAST TO SR-79 I WARREN RD

APPROVED BY: COUNTY OF RIVERSIDE

DATE

DIRECTOR OF TRANSPORTATION JUAN C. PEREZ, RCE 49568 **REVISIONS** REV BY:

APR'D DATE BY: **REV** APR'D DATE 1 GR 03/22/12 JP 2 3

8-LANE **EXPRESSWAY** (184' R/W)

NO SCALE

STANDARD No. 87 (2 OF 2)



Coachella Valley Mosquito and Vector Control District

43-420 Trader Place • Indio, CA 92201 • (760) 342-8287 • Fax (760) 342-8110 • Toll Free 1-888-343-9399

E-mail: CVmosquito@cvmvcd.org • Website: www.cvmvcd.org

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CHARLES RICH Rancho Mirage

BRANKA B. LOTHROP, Ph. D. General Manager

August 21, 2012

To: Andrew Mogensen, AICP Principal Planner City of La Quinta P.O. Box 1504 78-495 Calle Tampico La Quinta, CA 92253



Subject: Comments regarding Notice of Completion of a Draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan Update, State Clearinghouse No. 2010111094

Dear Mr. Mogensen,

Thank you for the opportunity to express the position and concern of the Coachella Valley Mosquito and Vector Control District (hereafter, the District) regarding the Draft Environmental Impact Report (EIR) for the City of La Quinta General Plan Update (State Clearinghouse No. 2010111094).

The District is a non-enterprise independent special district accountable to the citizens of the Coachella Valley, charged with the protection of public health through the control of vectors and vector-borne diseases within its boundaries. We operate under the California Health and Safety Code Division 3, Sections 2000-2910 (known as the Mosquito Abatement and Vector Control District Law). Our activities include the prevention and control of mosquitoes, filth flies, eye gnats, and the red imported fire ant. The General Plan Update may result in increases in these vector populations and impact the ability of the District to control vectors. Specifically, the expansion of La Quinta into its Sphere of Influence to the south and east will increase the likelihood that residents encounter vector and nuisance insects in agricultural and wetland habitats.

J-1

J-2

Mosquitoes

Within the urbanized areas of La Quinta, as well as the rest of the Coachella Valley, mosquitoes breed in storm drain systems, neglected swimming pools, poorly designed or damaged landscape irrigation systems, and other containers that hold water for at least 96 hours. The most important vector species are the encephalitis mosquito and the southern house mosquito. These species can vector (transmit) West Nile virus, western equine encephalomyelitis and St. Louis encephalitis to humans. Additionally, West Nile virus and western equine

J-3

encephalomyelitis can infect horses, which is of interest to La Quinta due to its numerous equestrian trails.

The General Plan Update indicates that the number of dwelling units in the planning area will be increased to 53,103. The current number of dwelling units that are occupied year-round is 14,820 of the 23,489 available. If the current year-round occupation rate is kept constant at 63%, then 19,648 dwelling units could be expected to be unoccupied. If the current number of seasonal, recreational, and occasional use homes remains the same (27.5% according to the 2010 U.S. census), then 14,603 homes will be vacant for at least part of the year.

J-4

J-6

J-8

J-9

The District conducts aerial photography to determine if pools are neglected. In April 2012, we identified 245 pools in La Quinta as possibly being neglected, or approximately 1% of the dwelling units present. With an increase in dwelling units, we might expect this to reach 530 pools at build out. We currently see that approximately half of the pools on our possibly neglected list require treatment and follow-up inspections.

Storm drains, catch basins, dry wells, and detention basins are also commonly used as breeding sites for mosquitoes within the urban environment. Given that 2,084.5 acres of street rights of way are proposed to be built under the Preferred Plan, we expect that more storm drains will be built. We applaud La Quinta's commitment on page V-4 to be a Full Service Community. We agree that "storm drains ... [are] maintained in good working order and of adequate service level to address existing and future needs" is an important Guiding Principle and a task that ensures effective use of mosquito control products.

As the agricultural areas of the Sphere of Influence are built, residents are likely to encounter floodwater mosquitoes known as *Psorophora*. These mosquitoes are not vectors of disease; however, they are active day and night and are very painful biters. The addition of residents in the area will result in additional service requests, increasing our workload.

Filth flies and eye gnats

As the area within the La Quinta Sphere of Influence is developed from agricultural property into dwelling units, we expect to receive more requests for control of filth flies and eye gnats. Most flies lay eggs in decaying plant or animal matter as can be found in agricultural practices. We have seen the development of homes in traditionally agriculture areas result in unhappy homeowners who are not pleased with the presence of adult flies. We can and do recommend methods of preventing breeding sources of flies, but properties that are zoned for agriculture do have potential for fly breeding even when practicing standard and acceptable agricultural practices as defined by the California Health and Safety code.

Red imported fire ants (RIFA)

While the red imported fire ant (RIFA) is not a vector of disease, it is an invasive species within the Coachella Valley that produces a very painful sting. People may experience localized pain or swelling and in some cases, anaphylactic shock. In urban areas, they build mounds close to buildings, in school yards, athletic fields, golf courses, and parks. In agricultural areas, they can build mounds near water sources and drip irrigation systems, feed on seeds and budding fruits, and sting livestock. La Quinta already has several golf courses that are infested with RIFA, and

further creation of green spaces will likely result in the spread of the insect into the currently less urbanized Sphere of Influence.

We applaud the City of La Quinta's commitment to using desert landscaping techniques as well as the development of educational programs and demonstration gardens to inform the public and businesses of water efficient techniques and sustainable practices. Reducing water use, particularly wasted water that flows into storm drains, will result in decreases in vector populations. We encourage the city to work with us and future developers to use vector prevention strategies when building storm drains and choosing landscape options.

J-10

Sincerely,

Jennifer Henke, M.S. Environmental Biologist jhenke@cvmvcd.org

cc: Branka B. Lothrop, Ph.D., General Manager Jeremy Wittie, M.S., Scientific Operations Manager



Carolyn Syms Luna Director

RIVERSIDE COUNTY DEPARTMENT

Memorandum

DATE:

August 27, 2012

TO:

City of La Quinta Planning Department

FROM:

Riverside County Planning Department

RE:

City of La Quinta General Plan Update

Dear City of La Quinta,

Thank you for the opportunity to review the City's General Plan Update and associated EIR.

The County of Riverside has taken notice that a significant portion of unincorporated Riverside County is included within the Sphere of Influence of the City of La Quinta, namely the Vista Santa Rosa Community to the east of the City of La Quinta.

The Vista Santa Rosa community has been the subject of an intensive and collaborative planning effort initiated by County staff, the community councils within this area, and other stakeholders engaged within the community.

The Vista Santa Rosa Design Guidelines were adopted by the Riverside County Board of Supervisors in January 2009, after completion of this collaborative effort and are available at the following link: http://www.rctlma.org/planning/content/devproc/quidelines/vista santa rosa/vista santa rosa logo us age guide pdf

The County of Riverside requests that continued consideration of the comprehensive identity for the Vista Santa Rosa community, as referenced and detailed within the Design Guidelines, is incorporated into the City's updated General Plan and any other associated planning documents.

Please feel free to contact me with any duestions or concerns at (951) 955-6646 or via email at arush@rctima.org.

Sincerely,

Adam Rush, Principal

KC: Carolyn Syms Luna, Planning Director Frank Coyle, Deputy Director, REA I

> Riverside Office · 4080 Lemon Street, 12th Floor P.O. Box 1409, Riverside, California 92502-1409 (951) 955-3200 · Fax (951) 955-1811

Desert Office · 38686 El Cerrito Road Palm Desert, California 92211 (760) 863-8277 · Fax (760) 863-7555

"Planning Our Future... Preserving Our Past"

K-1

City of La Quinta
Planning Department
Attention: Andrew Mogensen
78-495 Calle Tampico
La Quinta, CA 92247-1504

August 27, 2012

Re: Comments on General Plan Update -Draft E.I.R.

Gentlemen,

Attached is a commentary and a number of questions and concerns about the Circulation element portion of the Draft E.I.R. which was prepared by Endo Engineering the Traffic Engineering consultant for the Travertine project.

Hofmann Land Development Co is representing Travertine Corporation in its effort to entitle and eventually develop the Travertine property in South La Quinta. A variety of constraints have been identified in analyses performed by Travertine which are likely to modify the scope and type of development of the subject property from that which is shown on the General Plan Update and the previously approved Specific Plan and other entitlements. Of particular concern to the property owners is the planned road network and the ability to deliver all of the road segments identified in this E.I.R. and prior City circulation documents given these constraints. Madison Street Extension, Jefferson Street extension and Ave 62 Extension all serve and extend through the project under current General Plan scenarios.

We have made numerous requests to staff to work with us to review and analyze the modification and/or the possible deletion or conversion to emergency access of one or more of these roads as part of this General Plan Update. Staff has advised that such review and analysis is not timely and should be undertaken later as part of a Specific Plan review of the Travertine property. We have respected this requested, as it has been our understanding that the City intends to review and apply the circulation element flexibly in this area of the City understanding that among other things, it is not in the public interest to construct roads that are unnecessary or oversized. The Endo Engineering analysis of the report reveals that this southerly area of the City was not extensively studied and much detailed information is lacking when compared to the analysis performed in other areas.

For the above reasons we request that a written statement be included in the policy document confirming that circulation will be flexibly interpreted in the Southerly Jefferson/Avenue

L-1

58/Madison/Avenue 62 area and further that an acknowledgement of this be included in the EIR Circulation analysis.

We also seek clarification of a related statement in the General Plan Update regarding all weather crossings as found on II-53 of the Update. Jefferson and Madison streets are correctly identified as all—weather crossing where they extend over Dikes 4 and 2. The further southerly extension of Jefferson, if constructed, may not be an all weather facility.

Although this may not be a direct Draft EIR comment, but we note that financial modeling referenced in the Draft General Plan Update notes that the City has relied upon an assumption of 500 Hotel units in the Travertine project. It remains Travertine's desire to accommodate an element of Transit occupancy tax generating land use in the project. The 500 hotel unit assumption used for the property is a gross overstatement of the potential for this property and should not be used in the City's financial projections, land use or other assumptions. The City's own experience in successfully integrating Hotel uses in its central location is a credible citation for decreasing this assumption. We recommend and request that a more reasonable 125 to 150 room maximum Hotel-like facility located in the Travertine development be used in this document and in other financial assumptions.

Thank you for the opportunity to comment on these documents.

Hofmann Land Development Company

David T. Lennon

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



September 5, 2012

Andrew Mogenson, AICP Principal Planner City of La Quinta P.O. Box 1504 78-495 Calle Tampico La Quinta, CA 92253



RE: Transmittal of Notice of Completion of a Draft Environmental Impact Report (DEIR) for the City of La Quinta General Update State Clearinghouse No. 2010111094, La Quinta, CA

Dear Mr. Mogenson:

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to invite the Tribal Historic Preservation Office (THPO) in the providing comments on the City of La Quinta General Update DEIR. The General Plan Update is not located within the boundaries of the ACBCI Reservation however it is within the Tribe's Traditional Use Area (TUA). The THPO has the following comments:

According to our records on Cahuilla landscapes, there are traditional cultural properties exist within the General Plan area that have not been documented Dr. Lowell Bean's book *The Cahuilla Landscape (1991)* and Frank Patencio's book, *Stories and Legends of the Palm Springs Indians (1943)* describe two Cahuilla place name locations. *Cow on vah al ham ah* is a settlement area for the Cahuilla located east of Happy Point. The area is associated with the Cahuilla culture hero *Eagle Flower* who made impressions into the surrounding landscape. Another Cahuilla place name location is located near the historic La Quinta Hotel on Eisenhower. Oral traditions suggest *Eagle Flower* resided in a village known as *Kōtevewit* along the foothills. Archaeological sites and cultural resources mentioned in the DEIR may be associated with these important Cahuilla place names locations.

Because of the documented traditional landscapes and cultural resources located within the planned area and sensitivity of these places the ACBCI THPO requests the following to be considered and incorporated into the General Plan:

 We request a thorough background research in traditional Cahuilla landscapes and oral history to better understand the cultural significance and potential impacts to the Cahuilla traditional places. This research shall be added to the historic and prehistoric sections of the plan under Cultural Resources

2. Under Section III-66 3.1 Mitigation Measures regarding consultations with tribes, we would like to emphasize the need for consultation on every project

M-1

M-2

M-3



M-6

M-7

M-8

3. Section III-66 3.2 Mitigation Measures, we request the following be added: 100% survey and cultural resource inventory is required prior to the approval of projects

4. Section III-66 3.2 Mitigation Measures, we request copies of any associated cultural resource reports and site records that might be generated in connection with these efforts for review and comment

 Section III-66 3.2 Mitigation Measures, we request a review period of 45 days to review the associated cultural resource reports and site records and will provide additional comments, such as proposed mitigation measures or conditions of approval, at that time.

6. Page III 67 Section A. Mitigation Monitoring and reporting we request an Approved Cultural Resource Monitor(s) must be present during any ground disturbing activities by developers. Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified (Secretary of the Interior's Standards and Guidelines) Archaeologist to investigate and, if necessary, prepare a mitigation plan for submission to the Agua Caliente Tribal Historic Preservation Officer. Work on the overall project may continue during this assessment period.

7. We request specification if human remains are encountered during grading and other construction excavation, work in the immediate vicinity shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5.

The Agua Caliente Tribe appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 699-6907. You may also email me at ptuck@aguacaliente-nsn.gov.

Cordially,

Patricia Garcia-Tuck, Director Tribal Historic Preservation Office

AGUA CALIENTE BAND OF CAHUILLA INDIANS

c: Agua Caliente Cultural Register

X:\CONSULTATIONS Letters\FY2012\ TUA \LaQuinta_DEIR_GenPalnUpdate_09_05_12.docx



/A PLANNING & RESEAF

TRIBAL COUNCIL

TRANSMITTAL MEMORANDUM NOTICE OF COMPLETION

Date:

July 10, 2012

To:

Responsible Agencies and Interested Parties

From:

Margoret Park Nicole Sauviat Criste, Planning Consultant, City of La Quinta

Subject:

Transmittal of Notice of Completion of a Draft Environmental Impact

Report (DEIR) for the City of La Quinta General Plan Update

State Clearinghouse No. 2010111094

Enclosed please find the above referenced Draft EIR for the City of La Quinta General Plan Update.

The project involves the assignment of land use designations on incorporated City lands, and its Sphere of Influence. The document is being provided to you for review as a responsible agency or interested party.

The comment period runs from July 12, 2012 to August 27, 2012. If you have comments, please submit them prior to August 27, 2012. You may FAX comments to the attention of Andrew Mogensen, AICP, Principal Planner, at FAX No. (760) 777-1233 within this time frame. Please also send hard copies to the City, attention Andrew Mogensen, via mail to the address below to assure legible and reproducible originals.

Mr. Andrew Mogensen, AICP Principal Planner City of La Quinta P.O. Box 1504 78-495 Calle Tampico La Quinta, CA 92253

If you have any questions regarding the enclosed or require additional information, please do not hesitate to contact me at (760) 341-4800 or Mr. Mogensen at (760) 777-7125.